

INSTALLATION SPILL CONTINGENCY PLAN HEADQUARTERS, U.S. ARMY GARRISON FORT RITCHIE, MARYLAND

FINAL

April 1993

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HEADQUARTERS, U.S. ARMY GARRISON FORT RITCHIE FORT RITCHIE, MARYLAND AND ALTERNATE JOINT COMMUNICATIONS CENTER ADAMS COUNTY, PENNSYLVANIA

APRIL 1993

To be amended in April 1995

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HEADQUARTERS, U.S. ARMY GARRISON FORT RITCHIE FORT RITCHIE, MARYLAND AND ALTERNATE JOINT COMMUNICATIONS CENTER ADAMS COUNTY, PENNSYLVANIA APRIL 1993

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Director of Engineering and Housing Fort Ritchie

Commander, Fort Ritchie

Commander,
Alternate Joint Communications Center

CERTIFICATION

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	Printed Name of Professional Engineer	_
	Printed Name of Professional Engineer	
	Signature of Professional Engineer	
Date _	Registration No	State

RECORD OF BIENNIAL REVIEW

As described in Section 1, this Installation Spill Contingency Plan must be reviewed and recertified at least once every two years by a registered professional engineer. The Fort Ritchie Environmental Management Division will ensure that this plan is reviewed as required by 40 CFR 109 and AR 200-1.

Review Status

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Date

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ACRONYMS

AJCC Alternate Joint Communications Center

AR Army Regulation

CERCLA Comprehensive Environmental Response, Compensation and Libility Act

CFR Code of Federal Regulations
COC Command Operations Center
COMAR Code of Maryland Regulations

CWA Clean Water Act

DEH Directorate of Engineering and Housing
DER Department of Environmental Resources

DOD U.S Department of Defense DOL Directorate of Logistics

DOT U.S. Department of Transportation

EC Emergency Coordinator

ECP entry control point

EET Exercise Evaluation Team

EMA Emergency Management Agency

EMD Environmental Management Division
EPA U.S. Environmental Protection Agency

HSWMA Hazardous and Solid Waste Management Administration

HWSF hazardous waste storage facility

IC Installation Commander

IOSC Installation On-Scene Coordinator

IR-IOSC Initial Response Installation On-Scene Coordinator

IRT installation response team

ISCP Installation Spill Contingency Plan

MCP Mobile Command Post

MP Military Police

MSDS Material Safety Data Sheet
NCP National Contingency Plan
NRC National Response Center
NRT National Response Team
O&M operations and maintenance

OSCG on-scene control group

OSHA Occupational Safety and Health Administration

PAO Public Affairs Office

P-IOSC primary installation on-scene coordinator

ACRONYMS

(Continued)

QA quality assurance

RCRA Resource Conservation and Recovery Act

RRT regional response team

SCBA self-contained breathing apparatus

SPR Spill Prevention Responses
USCG United States Coast Guard
USTs Underground Storage Tanks

EXECUTIVE SUMMARY

This Installation Spill Contingency Plan has been prepared to comply with Title 40, Code of Federal Regulations (CFR), Part 109 (40 CFR 109) as directed by Army Regulation (AR) 200-1. The plan addresses spill response, reporting, and cleanup procedures for oil and hazardous substances spills on Fort Ritchie and other properties managed by Fort Ritchie in Maryland (Sites C and D) and Pennsylvania (Site R). In addition, this plan discusses Fort Ritchie resources available for a Regional Response Team for the National Contingency Plan. Preparation of this Plan has been in accordance with the guidance of Chapter 8 of AR 200-1, Environmental Protection and Enhancement. Finally, the Plan serves as a statement of command policy and intent as well as a working document for personnel involved with oil storage and transfer, handling of hazardous substances and spill prevention. This Plan meets the requirements of 40 CFR 109 for an Oil Removal Contingency Plan as well as corresponding Maryland and Pennsylvania regulations for such plans.

1.0 INTRODUCTION

Army Regulation (AR) 200-1 requires Installation Commanders (ICs) to maintain an Installation Spill Contingency Plan (ISCP) that identifies resources for responding to and cleaning up spills of oil and hazardous substances at installations and activities. The ISCP is also to identify resources available to provide assistance to other agencies, when requested, in accordance with the National Contingency Plan (NCP). Fort Ritchie-Main Post, Site C and Site D in Maryland, and the Alternate Joint Communication Center (AJCC) in Pennsylvania handle large quantities of petroleum products and hazardous substances, and have resources and capabilities suitable for providing assistance under the NCP. For these reasons an ISCP is required, and will take the form of this are document which addresses the requirements of the Federal regulations as well as Maryland and Pennsylvania requirements.

This Plan discusses responsibilities, resources, and procedures for the response, cleanup, and reporting of oil and hazardous substance spills at Fort Ritchie and the AJCC (hereafter referred to as Site R). Although each spill scenario is unique, the information in this Plan is applicable to the management of any spill at either facility or on additional properties managed by Fort Ritchie. The size of the spill and the dangers posed will determine the extent to which the Plan is applied.

Fort Ritchie and Site R must also be prepared to provide assistance with spill-control and cleanup efforts to outside agencies if such assistance is requested (AR 500-60). This regulation also stipulates that, in accordance with NCP requirements, Fort Ritchie and Site R may be required to assist the U.S. Environmental Protection Agency (EPA) and the United States Coast Guard (USCG) in spill-control and cleanup operations. This Plan indicates the availability of those resources.

This document is intended to provide information in an easily usable format in which Fort Ritchie (including Site C and Site D, all in Maryland) and Site R facilities (in Pennsylvania) are treated in separately. Fort Ritchie and the Site R and discussed in separate sections of this document (Sections 2 and 3 respectively) and all figures, tables, and exhibits pertinent to the emergency information referred to throughout each section are provided together in that section so that they can be to be readily accessed in the event of an emergency. These figures and tables are provided at the end of each of the sections, with a listing of them on the page proceeding them.

2.0 FORT RITCHIE MAIN POST AND PROPERTIES IN MARYLAND

2.1 Provisions Specifying Responsibilities And Duties For Spill Containment And Cleanup At Fort Ritchie, Maryland

The responsibility for prevention of oil and hazardous substances spills at Fort Ritchie lies ultimately with the Fort Ritchie IC. A chain of command has been established, however, to ensure compliance with the various components of this ISCP. In addition, a reporting sequence is established to ensure that, when an incident occurs, the proper personnel are notified so that appropriate actions are taken. Use of the notification sequence (see Figure 2.1) and appropriate actions of the responsible parties (Tables 2.1 and 2.2) should minimize the impact of a spill occurrence.

Close coordination between departments and agencies involved in response to a discharge or spill event is imperative to ensure proper and complete remedial action. For the majority of environmental episodes expected to occur at Fort Ritchie, this coordination will take place between the Fort Ritchie Fire Department and the Environmental Management Division (EMD). The Fort Ritchie Fire Chief is the Initial Response Emergency Coordinator (EC) or Initial Response Installation On-Scene Coordinator (IR-IOSC). The primary EC or Primary IOSC (P-IOSC) is the base Environmental Coordinator, who is also a representative of the EMD. The names, phone numbers, and addresses of all personnel acting as Fort Ritchie emergency coordinators are shown in Table 2.3.

Spill-containment or cleanup efforts will be performed by the Installation Response Team (IRT). The IRT acts as the facilities emergency response team performing functions as identified, directed, and coordinated by the IOSCs.

The IRT consists, at a minimum, of the:

- IOSC (or Alternate IOSC),
- Fort Ritchie Fire Department,
- EMD,
- Safety Officer,
- Security Division, Military Police (MP),
- Public Affairs Office (PAO), and
- Operations and Maintenance (O&M) Contractor.

These participants are the minimum IRT. The persons and/or organizations listed below have the responsibility of implementing this Plan, and include the minimum IRT members as well as other organizations which may be required by the P-IOSC to participate. Since spills could occur at different facilities, affecting different personnel, only those organizations or people involved in spill response for a particular spill area would need to respond.

The order of the following discussion of responsibilities is from employees up through supervision rather than the traditional highest to lowest order. This is done to present the information in the same order as the notification sequence for responders who may need more information on their responsibilities.

2.1.1 Fort Ritchie Personnel

All Fort Ritchie personnel bear some responsibilities during a spill event. The following subsections delineate those responsibilities according to personnel category.

2.1.1.1 Employee

Each employee at Fort Ritchie has the following responsibilities:

- Notify a supervisor immediately after finding or observing an oil or hazardous substance spill.
- Do not touch the spilled material.
- Restrict access to the spill area.
- Evacuate area if spill is a known hazardous substance stay upwind.
- Remove ignition sources.
- If a supervisor cannot be quickly located, call the Fort Ritchie Fire Department to notify them of the situation (see Fig. 2.1 and Table 2.1).
- Assist as directed by supervisor in the control and/or cleanup of spills.

2.1.1.2 Fort Ritchie Fire Department

The Post Fire Department is responsible for coordinating control and cleanup efforts for spills of oil or hazardous substances. The Fire Chief is also the IR-IOSC with duties that include:

- Leading the IRT;
- Evaluating information received to determine the character, source, extent, and nature of the oil or hazardous substance spill. Ascertain spill reporter's name, call back number, and any action taken to contain the spill;
- Notifying the EMD of a spill;
- Coordinating spill-containment and control efforts;
- Providing for fire-fighting assistance if required;
- Coordinating emergency-response actions until relieved by the P-IOSC;
- Indicating the need for the evacuation of personnel in the area to the Fort Ritchie MP Security Division;
- Directing the training exercises that are required at least once annually;

- Maintaining and operating the on-scene Mobile Command Post (MCP); and
- Calling for reinforcements if necessary.

The Fire Department, in most cases, will be the initial responder to hazardous spills due to their alerting system and rapid response capabilities. The Fire Chief will direct the firefighters, within the realm of standard practices and good common sense, to contain and control the spill, and will have final word on the commission of personnel to any action taken in controlling and containing a spill. Once the spill is contained and controlled the P-IOSC will take charge of the cleanup.

2.1.1.3 P-IOSC [Chief, Environmental Management Division (EMD)]

The P-IOSC performs the following:

- He identifies the spilled quantity and type and assesses the consequences of all oil and hazardous substance spills on Post-managed properties.
- He coordinates and directs Army control and cleanup efforts at the scene of any oil or hazardous substance discharge on Fort Ritchie controlled properties. Responds to oil or chemical spills and ensures cleanup and decontamination procedures are carried out correctly. Mobilizes personnel and equipment for control and containment of spills with the authority of the IC.
- He ensures that the Fort Ritchie Fire Department responds immediately if a spill poses a significant threat of fire, explosion, or the release of contamination to the environment. If a smaller spill occurs, the coordinator will assist and provide guidance in the proper cleanup method for the spill. Calls for reinforcements as necessary in performing this task.
- He keeps the Director of DEH and IC continuously informed of the situation during a spill event;
- He indicates the need for evacuation of personnel in the area to the Fort Ritchie MP and has the personnel meet at predetermined location(s). He must account for all personnel.
- He inspects spill-control equipment quarterly at each facility.
- He performs periodic tests and drills to verify the effectiveness of the ISCP.
- He attends hazardous substance training courses and keeps abreast of current policies and regulations.
- He certifies when the area can be returned to normal use after a chemical spill has been cleaned up.

- He ensures that employees receive training in the proper action to be taken if a spill occurs. He ensures proper training for the IRT and the individuals responsible for small spills (less than 5 gal of oil or hazardous substance) at various Post facilities.
- He reviews the ISCP at least once every 3 years and updates the ISCP to assure that it is current and responsive to the activities and operations performed at the Post. Any modifications to the ISCP are to be completed within 6 months of the change prompting the modification.
- He notifies the Garrison Commander and the IRT leader in the event that IRT assistance is required for spill containment and cleanup.
- He determines whether a spill is reportable under Federal and Maryland regulations as described in Section 2.2.1 and notifies authorities of a spill event within the appropriate time frame. The EMD is authorized to contact all necessary outside agencies with approval by the IC (Table 2.5).

2.1.1.4 Directorate of Engineering and Housing (DEH)

The Chief of DEH is responsible to the IC to confirm, classify, and technically supervise control and cleanup of spills at Post-managed properties. His responsibilities include:

- Providing the resources necessary for the EMD and Fort Ritchie Fire Department to carry out their duties in accordance with this Plan;
- · Providing for emergency power and water if they are required during an emergency; and
- Establishing procedures for mapping and surveying disaster areas.

2.1.1.5 Leader, IRT

The IRT leader is the Fort Ritchie Fire Chief. His duties include:

- Regularly inspecting and becoming familiar with the various Post facilities and the chemicals, hazardous materials, and wastes used at each;
- Regularly inspecting the spill-control equipment at each facility to ensure all equipment is accounted for and operable;

- Attending all training sessions concerning spill control;
- Responding to all calls involving fuel, oil, or hazardous substance spills (the IRT leader will contact other team members when a spill alert occurs.); and
- Maintaining the IRT.

2.1.1.6 Security Division, MP

MP personnel will assume responsibility for control of non-essential personnel, on-lookers and traffic. The senior security officer will coordinate with the IOSCs and the PAO on the admittance of news media and photographers and with the IRT command post in the establishment of security perimeters, evacuations, and protection of government property, including the following:

- providing off-post convoy escorts for the movement of response teams responding in accordance with the NCP;
- providing security at the scene of all accidents or incidents/disasters involving U.S. Army resources on the Post;
- establishing and marking the on-scene, entry-control point (ECP), when directed by the IOSC, at emergency or disaster locations;
- coordinating actions between the Post and all local law enforcement agencies;
- coordinating evacuation operations, if necessary; and
- assisting local law enforcement personnel with crowd control, if requested to do so.

2.1.1.7 Installation Commander

The IC is responsible to:

- be the Chief of the Emergency Operations Staff;
- assume overall responsibility for the Post's Disaster Preparedness Program;
- ensure that an EET is established to evaluate local exercises; and

establish the IRT.

2.1.1.8 Operations Division

The Operation Division will:

- · develop, maintain, and monitor a Post Disaster Preparedness Program;
- coordinate to ensure timely, realistic exercises and evaluations;
- coordinate with local emergency planning officials; and
- maintain close contact with local authorities to ensure that plans and procedures of mutual interest are coordinated.

2.1.1.9 Public Affairs Office (PAO)

The PAO will coordinate with the IOSC to prepare any news release pertaining to a spill. Any news release will be approved by the IC before release to the media. Upon the direction from the IC and IOSC, the PAO will prepare an immediate news release if circumstances dictate that the spill could endanger the health and safety of the public or if an evacuation is necessary. Other PAO responsibilities include:

- Acting as the Office of Primary Responsibility for the release of all information to the public news
 media and/or other nongovernmental personnel. The PAO will be the Post's releasing authority for
 information to media, whether that information is initiated by the Post or in response to query. This
 will include requests for interviews with and/or statements from personnel involved in a mishap.
- Activating a press center during emergencies/disasters either at the scene of the emergency or at a designated building.
- Receiving initial notification of all accidents, incidents, or emergencies and dispatch a representative
 to the scene of the emergency.
- Accompanying the P-IOSC to off-site accidents.

2.1.1.10 Directorate of Logistics

Directorate of Logistics (DOL) is responsible for:

- ensuring that appropriate agencies are informed of storage and/or movement of dangerous material on the Post; and
- providing the supplies, services, maintenance, and transportation needed to support this ISCP.

2.1.1.11 Director of Information Management

The Director of Information Management will:

 provide high frequency radio capability and qualified operators to the Command Operations Center (COC).

2.1.1.12 Resource Management Division

The Resource Management Division must:

- maintain procedures to assure that each activity involved in supporting civil agencies during disasters accounts for all supplies and services for which the Army can be reimbursed; and
- accumulate all expenditures incurred in support of disaster response, for reimbursement.

2.1.1.13 Chief, Office of Acquisition

Responsibilities of the Chief, Office of Acquisition include:

- providing emergency procurement actions; and
- ensuring that all contractors currently assigned to the Post are provided with disaster preparedness information.

2.1.1.14 Safety Division

The Safety Officer is responsible for the safe personal conduct of individuals involved in spill control and cleanup operations. The Safety Officer oversees all operations for application of all required safety

precautions. The Safety Officer also will see that applicable Material Safety Data Sheet(s) (MSDS) are available at sites where those materials are used.

2.1.2 Operations and Maintenance Contractor

O&M Contractor for Fort Ritchie is ColeJon Corporation, which provides mechanical, electrical, and small construction services on Post-managed properties.

2.1.2.1 Employee

Employee duties are to:

- 1. Notify the Shop Foreman or a supervisor or other person in a position of authority immediately after finding or observing a fuel or hazardous substance spill; or
- 2. If the Shop Foreman or a supervisor cannot be quickly located, call the Fort Ritchie Fire Department to notify them of the situation (Fig. 2.1, Table 2.1); and
- 3. Assist, as directed by supervisor, in the control and/or cleanup of spills.

2.1.2.2 Shop Foreman/Supervisors

Supervisors shall:

- inspect daily fuel or hazardous substance tanks and drums for leaks, spills, or damage;
- notify the project manager of the O&M Contractor in the event of a spill.

2.1.2.3 Project Manager

The O&M Contractor Project Manager will ensure that:

- inspections are performed daily for the detection of fuel or hazardous substance leaks or spills;
- the Fort Ritchie Fire Chief is notified (at 4500) of all spills; and
- he is responsible to the Contracting Officer for all matters regarding oil or hazardous substance spills and spill prevention.

2.2 Immediate Spill Response Actions - Fort Ritchie

This section indicates the specific actions to be taken in the event of a spill at Fort Ritchie managed properties in Maryland. It includes procedures for spill discovery, the spill-notification process, and spill-response. Both oil and hazardous substance spills are covered by this plan. Since the spill plan requirements for hazardous substance spills are somewhat different than those of oil spills, discussion of the responses will be handled separately.

2.2.1 Spill Definitions

A spill is broadly defined as a release of any kind of a petroleum product or hazardous substance to the environment. Spill reaction is based largely on the nature and quantity of the material spilled. For purposes of reporting spills to the Maryland Hazardous and Solid Waste Management Administration (HSWMA), no minimum amount of spilled material is specified. In addition, Title 40, Code of Federal Regulations (CFR), Part 110.3(b) [40 CFR 110.3(b)] defines a reportable spill (or discharge) as any quantity which is determined to be "harmful" and may include quantities which "cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shoreline" of any body of navigable water. In order to ensure compliance with the requirements of Code of Maryland Regulations (COMAR) 26.10.01.03, all spills that are determined to be potentially "harmful" to navigable waters will be reported. The EMD is the only party authorized to report spills to the National Response Center (NRC) as required by 40 CFR 110 or to the Maryland HSWMA. The reporting of hazardous substance spills is required as specified under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Clean Water Act (CWA) regulations, 40 CFR 302 and 40 CFR 116 respectively.

2.2.2 Spill Discovery

The initial component in the spill-response plan is discovery. The primary responsibility of a discoverer is to notify the proper authorities, who are trained and equipped to deal with an environmental episode. When a spill is discovered, the person discovering the spill takes the following actions:

- 1. Take action to stop the source of the spill if he is properly trained to do so and if it can be done safely.
- 2. Begin the notification process shown in Figure 2-1.

2.2.3 Assessment

During every step of the spill-response process, each responding individual will continually assess the situation and will make decisions on the next appropriate action to be taken. Upon initial discovery, the discoverer and/or the supervisor will provide the following information as completely as possible to help the IR-IOSC assess the magnitude and potential seriousness of the spill or release:

- 1. Time and type of incident (e.g., release or fire)
- 2. Name and quantity of spilled material involved (to the extent known) and the rate of release
- 3. Direction of the spill and vapor, or smoke released
- 4. Fire and/or explosion possibility
- 5. Coverage area of spill and the intensity of any fire or explosion
- 6. The extent of injuries, if any

The IR-IOSC will determine the appropriate response based upon the potential risks associated with the spill and whether an imminent or actual threat exists to human health or the environment. Below are decision-making criteria to provide guidance to the IR-IOSC in making this determination. If any of the following conditions occur, the appropriate notifications will be made, and the IRT will be mobilized to control, contain, and clean up any spilled material:

- the spill could result in the release of flammable or combustible liquids or vapors, causing a potential for a fire or gas explosion hazard;
- the spill could cause the release of toxic liquid or fumes;
- the spill can be contained on the site, but the potential exists for groundwater contamination; and
- the spill cannot be contained on the site, resulting in off-site soil contamination and/or ground- or surface-water contamination.

2.2.4 Response Phases For Oil Spills

Defensive actions should begin as soon as possible to prevent or minimize the potential risk to public health and/or the environment. See Tables 2.1 and 2.2 for immediate response actions for oil/fuel spills or spill of other types of hazardous substances. The following general actions must be employed.

- 1. Eliminate sources of spark or flame.
- 2. Control the source of the discharge.

- 3. Place physical barriers such as berms or dikes to deter the spread of oil.
- 4. Prevent the discharge of contaminated water into the storm drain or sewer system.
- 5. Recover the oil or minimize its effects.
- 6. Recovered oil and contaminated sorbents, rags, etc., must be placed in DOT-approved containers and disposed of as hazardous waste as applicable.

2.2.4.1 Oil/Fuel Spill Discovery, Control and Containment

Control and contaminant operations shall be directed as follows by the IR-IOSC.

- 1. If spilled material is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of this area will generally depend upon the size of the spill and the waste involved.
- 2. If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 ft wide and 1000 ft long will be evacuated downwind if any measurable quantities of volatile (toxic or combustible) materials are detected in the air.
- 3. As much of the material as possible will be collected using pumps or tank trucks.
- 4. Hay or other sorbent material will be used to absorb the oil that cannot be collected by pumping.
- 5. Contaminated earth, hay, or other sorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- 6. The P-IOSC will determine when the area has been cleaned up sufficiently for the area to be returned to normal service.
- 7. Oil contaminated dirt may be disposed of in a solid waste landfill designated for that purpose, if oil contaminant levels are within applicable Maryland HSWMA regulatory limits for landfill disposal.

When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or otherwise blocked off.

According to 40 CFR 110, as soon as anyone has knowledge of a reportable oil spill, that person shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC immediately after approval by the IC (see Table 2.5). The Maryland HSWMA is to be notified after notification of the NRC. The NRC will notify United States Coast Guard (USCG) and EPA as necessary.

2.2.5 Response Phases For Hazardous Substances Spills

Defensive actions should begin as soon as possible to prevent or minimize damage to public health or welfare or to the environment. See Table 2.2 for immediate response actions for spills of hazardous substances. The following general actions must be employed:

- 1. Eliminate sources of spark or flame.
- 2. Control the source of the discharge.
- 3. Place physical barriers such as berms or dikes to deter the spread of the hazardous substance.
- 4. Prevent the discharge of contaminated water into the storm drain or sewer system.
- 5. Recover the hazardous substance or minimize its effects.
- 6. Place recovered material and contaminated sorbents, rags, etc., in DOT-approved containers and disposed of as hazardous waste as applicable.

2.2.5.1 Hazardous Substance Spill Discovery

When a spill occurs or is discovered the discoverer will immediately notify his supervisor. The supervisor will consult with the Post Fire Chief to determine whether the containment and its cleanup are within the capability of the organization reporting the spill. This mandatory telephone notification will be followed by a memorandum notification to DEH with the data from an Oil and Hazardous Substances Spill Notification Information form (Exhibit 2.2).

The IR-IOSC should conduct a site visit, if this can be accomplished safely. If appropriate response actions are being undertaken by the person or unit responsible for the discharge, the IR-IOSC will provide surveillance and any requested assistance. If effective actions are not being taken, or if the responsible party is unable to deal with the discharge, the IR-IOSC will then initiate the IRT.

The IR-IOSC will immediately identify the character, exact source, amount, and area or extent of the release. Hazardous substances at Fort Ritchie are stored in industry approved hazardous substances storage sheds according to their hazardous characteristics, and a record is kept of all wastes and containers placed in each storage shed from which identification could be made. For hazardous substances stored on a regular basis, the host organization will develop specific spill responses designed for each hazardous substance or hazard category, whichever is most appropriate. If for some reason the released substance cannot be identified by matching visual observation with operating log records, then samples will be collected for chemical analysis.

Immediate notification of reportable spills is directed by 40 CFR 110. As soon anyone has knowledge of a reportable oil spill, that person shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC and the Emergency Management Agency (EMA) office immediately after approval by the IC (see Table 2.5). The Maryland HSWMA is to be notified after notification of the NRC and the EMA. The NRC will notify USCG and EPA as necessary.

2.2.5.2 Control and Cleanup of Hazardous Substance Spills

Immediate removal of spilled hazardous substance will be started as soon as the IR-IOSC determines that the initiation of immediate removal action will not pose an unreasonable risk of harm to human life or health. Immediate control measures associated with spill cleanup may include:

- 1. recommending the evacuation of threatened individuals;
- 2. rendering the spilled substance less hazardous by neutralization, elimination of spark sources, blanketing with foam, etc;
- 3. controlling the source of release;
- 4. placing physical barriers such as berms or dikes to control or stop the spread of the release;
- 5. controlling water discharge both upstream and downstream of the spill;
- 6. fencing or roping off the contaminated area;
- 7. collecting spilled substance by absorption, pumping, etc;
- 8. moving hazardous substances off the site for storage or disposal;
- 9. providing alternative water supplies; and/or
- 10. collecting and analyzing samples to determine the source and dispersion of the hazardous substance.

Cleanup operations will be directed as follows by the IR-IOSC:

- 1. If the spilled substance is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of the area will generally depend upon the size of the spill and the waste involved.
- 2. If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 feet wide and 1,000 feet long will be evacuated downwind if any measurable quantities of volatile (toxic or combustible) materials are detected in the air.
- 3. As much of the hazardous substance as possible will be collected using pumps or tank trucks.

- 4. Hay or other sorbent material will be used to absorb the substance that cannot be collected by pumping.
- 5. Contaminated earth, hay, or other sorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- 6. The P-IOSC will determine when the area has been cleaned up sufficiently to be returned to normal service.
- 7. Hazardous or toxic substances resulting from a spill, fire, or explosion will be packaged, stored and disposed of in accordance with Federal, state, or local regulations or instructions from EPA. Since the Post does not maintain a permitted Hazardous Waste Storage Facility (HWSF), 90-Day Accumulation Areas, Satellite Accumulation Sites or other Resource Conservation and Recovery Act (RCRA) storage areas, storage of wastes will be in the approved hazardous material storage sheds unless other appropriate areas are set up.
- 8. In the event that a spill of hazardous substance or waste results in soil or groundwater contamination, a hazardous substance remedial action program must be developed to remove the contamination (in accordance with cleanup levels specified by the Maryland HSWMA).

When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or otherwise blocked off.

2.3 Identification Of Resources Available To The Regional Response Team (RRT) For NCP

Fort Ritchie is required to provide assistance to outside organizations if requested by EPA or USCG. AR 500-60 provides policy and guidance for Army response according to the NCP.

When requested, Fort Ritchie will provide personnel and equipment to the RRT or the National Response Team (NRT) for containment and cleanup of spills not caused by Army activities. Fort Ritchie will respond to such a request by supplying the same level of resources as available for on-site emergencies. Available resources are indicated in Table 2.6.

Resources are to be supplied as support for outside agencies. Authority for the control and coordination of outside cleanup efforts will be the responsibility of the local authorities in charge. The Army organization involved with the response action retains command authority over its Army personnel.

2.4 Name And Responsibilities Of IOSC

AR 200-1, item 1-25i (13) requires that an P-IOSC be appointed by the IC and adequately trained and prepared to act according to NCP requirements.

The P-IOSC has primary responsibility for response actions following a spill and will coordinate response plans with the regional response team (RRT), state, and local representatives. The P-IOSC will:

- 1. ensure that IRT is alerted, assembled, and dispatched to the accident scene;
- 2. report to the accident scene or convoy as applicable;
- 3. ensure proper location of MCP and relocation if necessary;
- 4. upon arrival, receive briefing on action taken from the Fire Chief (who is the IR-IOSC), and other personnel and assume command;
- 5. ensure the presence of essential personnel and equipment;
- 6. determine the need for additional support teams;
- 7. ensure that evacuation of the area has been accomplished and that a disaster cordon has been established;
- 8. keep the COC informed of the disaster situation and the action being taken;
- 9. ensure that ECP on the cordon is established and is free of unnecessary personnel;
- 10. declare "ALL CLEAR" following withdrawal, as the situation dictates;
- 11. assemble on-scene control group (OSCG), identified in Table 2.3, and determines need for initial reconnaissance of disaster area;
- 12. brief and debrief IRT;
- 13. after area is declared safe, secures accident scene for investigation purposes and implements entry control procedures as required;
- 14. ensure adequate coordination with local civil authorities so that mutual understanding and agreement is reached regarding the appropriate action to be taken at the accident scene;
- 15. coordinate logistical support as necessary;
- 16. report all spills of reportable quantities of oil and hazardous substances in accordance with AR 500-60 through command channels to the appropriate authorities (also see Table 2.5 and Exhibits 2.1, 2.2, and 2.3);
- ensure that the RRT and the appropriate U.S. Department of Defense (DOD) agencies are notified for necessary action if installation personnel cannot respond sufficiently to contain and clean up a spill; and
- 18. Obtain emergency assistance in the form of information regarding the effects of chemicals on human health or the environment and suggestions for treatment, containment, and control of a spill, leak, fire, or explosion. In the case of a chemical spill, this emergency assistance is available on a 24-hour basis from the NRC, the Army Operations Center, and the Chemical Transportation Emergency Center (see Table 2.5 for telephone numbers).

The IR-IOSC is the Post Fire Department Chief, Mr. Wolfe. The primary P-IOSC is the Post Environmental Coordinator, Mr. Hofmann. The IR-IOSC will respond to the scene when so requested and assess the seriousness of the situation. If necessary, he will contact the P-IOSC to request additional assistance. Both individuals will serve jointly in this capacity during duty hours and after duty hours. The names and addresses of the IOSCs and other ECs are given in Table 2.3.

2.5 IRT Composition, Training Plans, And The Location Of The Command Operation Center

Members of the IRT must respond to spill emergencies to minimize possible damage to human health or the environment; special training is required for such a response. IRT composition and training plans are discussed in this section. The COC plays a critical role in the spill-response process by coordinating the mobilization of resources and IRT members. The location of the COC, as required per 40 CFR 109.5 and AR 200-1, is provided below.

2.5.1 IRT Composition

The IRT consists of:

- · the IRT leader,
- the IRT organization (which is also the OSCG identified in Table 2.3), and
- responding forces.

The IRT leader is the Post Fire Chief, or his designee. He commands the IRT responding forces. When necessary, these forces are mobilized and made available to the IOSC.

The IRT organization is a small group consisting of the ECs listed in Table 2.3. Each of the members of the OSCG may be required to participate during emergency response actions. If required, each member will commit the necessary resources (equipment and manpower) to direct the activities within his area of responsibility.

IRT responding forces perform spill-control and cleanup operations. Responding forces are commanded by the IRT Leader. Table 2.6 shows the personnel available for spill response to spills of varying sizes. The IR-IOSC determines the required level of response based on the circumstances of a particular spill event.

2.5.2 IRT Training Program

The EMD is responsible for providing necessary training to all IRT members as necessary and required. IRT training is made up of classroom training and emergency-response training exercises. Classroom instruction is used to instruct IRT members in the hazards of the substances they may be exposed to during spill response. Field training exercises provide training on actual spill-control and cleanup activities. EMD will ensure that all members of the IRT receive proper hazardous substance response

training. All IRT members will become intimately familiar with the various facility layouts and the types of oil and hazardous substances used.

IRT members directly involved with spill containment and cleanup are required to receive additional training as described below. This training is not required for groups such as the PAO, MP, and O&M contractor personnel since they do not handle hazardous substances directly and do not function within the spill exclusion zone.

- All members will be trained in the use of self-contained breathing apparatus (SCBA). Practice for donning, using, and removing the equipment will be done on a quarterly basis. Tanks will be replenished after each emergency response or training session use.
- Members will be indoctrinated in classification of hazardous substances and their characteristics and in how to clean mop a spill and decontaminate the area. Incompatibilities between chemicals also will be covered.
- Members will receive Safety and Occupational Health training in accordance with the Occupational Safety and Health Administration (OSHA) and with 29 CFR 1910, 1917, and 1926. A periodic health monitoring program will be established for military and civilian personnel, including project managers who are employed in or responsible for carrying out official duties at oil and hazardous substance spill sites.

In addition, members will receive training in:

- methods of retaining spills;
- methods of recovering spilled substances;
- the disposition of contaminated soil and absorbent material and recovered pollutant, and
- · restoring contaminated area to its former condition.

One annual training exercise will be held to provide spill-response training to the members of the IRT. The Chief of EMD will conduct the exercises, evaluate the results in conjunction with the EET, and report the results of all training exercises.

Other employees working in areas where oil or hazardous substances are stored, transferred, or used require some level of training to familiarize them with any hazards associated with those materials. The following training procedure is recommended;

 All employees shall be instructed in the safety significance of the chemical spill procedure by their supervisors. It is recommended that all employees who work routinely with hazardous substances receive a one- or two-day industrial hazards course.

- Each new or transferred employee shall be trained to react to hazardous substance spills before being exposed to the hazardous substances.
- Supervisors will orient employees in the specific safety requirements of their work assignments.
 Supervisors will also provide continuing on-the-job instruction in safety procedures in consultation with EMD.

2.5.3 Command Operations Center Location (COC)

The location of the COC is to be determined by P-IOSC and IC and is the center of planning and control in the event of an emergency. The COC will be established as close as possible to the scene of the incident. The COC is activated in the event of an emergency requiring implementation of the Fort Ritchie Installation Disaster Plan. A spill of oil or hazardous substance large enough to require mobilization of resources beyond those of the IR-IOSC and the Post Fire Department may require implementation of the Installation Disaster Plan.

2.6 Procedures For IRT Alert And Mobilization, Including Access To Reliable Communication System And PAO Involvement

Immediate alert and mobilization of the IRT is essential to minimize the possible threat to human health and the environment from a hazardous substance spill. A reliable communication system is necessary to convey information between the IOSCs, responding personnel, and COC. This communications system is described in Section 2.6.2. IRT mobilization and alert procedures and communication systems available at the Post are discussed below. COC, however, is notified and updated any time the IRT is activated.

2.6.1 IRT Alert And Mobilization

IRT mobilization occurs as a result of a spill discovery and the initiation of the notification process. Upon discovery of an emergency condition requiring immediate response, the emergency notification process shown in Figure 2.1 is initiated. The IR-IOSC will determine whether to mobilize the IRT based on the seriousness of the situation. Once it is determined that emergency response forces are required, COC is notified and the IRT notification process begins. Members are alerted and given instructions to report directly to the disaster site or to a convoy point as conditions dictate.

2.6.2 Reliable Communications System

Communications during a spill emergency are coordinated through the COC, but should be handled directly by the incident commander at the scene as much as possible. Telephone systems are available at most locations where a spill is likely to occur. Should a spill occur in an area where telephones are unavailable or not functioning, intrapost radio systems are available to the IRT for command, control, and

coordination of disaster response. Equipment that is available to support communications during installation disaster response is listed in Table 2.7.

2.6.3 PAO Involvement During A Spill Emergency

The PAO is responsible for releasing information to the public news media. Specifically the PAO will perform the following functions. It will:

- Act as the point-of-release of all information to the public news media and/or other nongovernmental personnel. PAO will be the Post's releasing authority for information to media, whether such information release is initiated by the Post or is in response to query. This will include requests for interviews with and/or statements from personnel involved in a mishap.
- Activate a press center, during emergencies or disasters, at the emergency scene or other location as determined by the Emergency Operations staff in the COC;
- Receive initial notification of all accidents, incidents, or emergencies and will dispatch a representative to the scene of the emergency.
- Accompany the P-IOSC to off-site accidents.

2.7 Current List Of Points Of Contact/Alternates On Call To Receive Notice Of A Spill

The names and phone numbers of people to call in the event of a spill are given in Figure 2.1. Table 2.3 gives names and numbers of the IR-IOSC, P-IOSC, and alternates, as well as additional ECs in the event that neither IOSC is available. In addition, Table 2.4 gives emergency phone numbers for medical personnel in the event of injuries associated with a spill. Table 2.5 lists key contacts and organizations to be contacted in the event of a spill.

2.8 Surveillance Procedures For Early Detection

Surveillance for the early detection of spills will be accomplished through the following procedures.

- All personnel are charged with the responsibility for periodic inspections of work and storage areas used in their operations.
- The contents of underground storage tanks (UST) are to be checked periodically to determine if leakage has occurred, in accordance with the management plans for these tanks.
- All oil and hazardous material storage areas shall be kept under security lock when not attended.

2.9 Quantity And Location Of Spill Response Resources And Water Protection Priorities

Fort Ritchie has a wide variety of equipment available for use in the event of a spill. The type and quantity of equipment used for spill containment and cleanup will depend upon the size of the spill and the substance spilled. In the event of a spill, a system of priorities must be used to protect the most

critical or most susceptible water resources. The quantity and location of equipment to be used for spill response and the priorities for water resource protection are discussed below.

2.9.1 Quantity And Location Of Spill Response Resources

Each facility where petroleum and/or hazardous materials is handled, loaded, unloaded, etc., should have spill-containment equipment. The level of equipment should reflect the amount of materials handled in that area and the spill history for the type of operation. Only one minor spill at Fort Ritchie in the last several years has reached navigable waters (Lake Royer) and was reportable under the requirements of 40 CFR 110. However, a hard rainfall combined with a larger fuel spill could result in oil or hazardous substances being carried to the lake in large quantities due to the fact that the entire Main Post area drains into the lake (either by storm drains or direct runoff) and is within 0.25 mile of the lake.

Limited spill control equipment should be available at a central location, housed in a locker or other suitable enclosure, at each facility where reportable spills are possible.

For spills beyond the capability of the supplies and manpower at the site of the spill, resources are available and can be dispatched to the site of the spill by the IR-IOSC. These resources are indicated in Table 2.6.

2.9.2 Priority Of Water Resource Protection

All water draining from the Main Post area flows into drainage ditches, concrete culverts and a storm sewer system. This system drains into two connecting lakes, upper and lower Lake Royer which cover 24 acres and contain 80 million gallons of water. Flow from Lake Royer, and all drainage from Washington County, is part of the tributary system of the Potomac River and is subject to contamination from any spills associated with Fort Ritchie. Efforts must be made to prevent such contamination. Both the upper and lower parts of Lake Royer are classified as swimming and recreational use waters, the quality of all Fort Ritchie local waters must be maintained to the standards set for waters used for fish and wildlife or swimming purposes.

The Post's drinking water supply wells normally draw water from aquifers not directly in contact with the waters of Lake Royer, but at certain times of the year drinking water is drawn from the lake in order to allow the wells to recharge. Thus, contamination of the local drinking water supply could occur if oil or hazardous materials were to be introduced into the lake.

In addition, groundwater in the basin where the Fort Ritchie Main Post is located also could be affected by spills of oil and hazardous substances due to it being as shallow as five feet below the surface in the areas surrounding Lake Royer.

Because of above potential, the following priorities are to be maintained in the protection of water resources when planning spill cleanup and containment.

- Contain all spills of fuels, oil, or hazardous substances at their source and prevent escape from the point of the spill.
- Since the criteria for drinking water quality are more stringent than for swimming or fish and wildlife water quality, priority must be given to the protection of Lake Royer and its tributaries, to protect a source of Post drinking water.

2.10 Other Available Resources For Spill Response On Or Near Fort Ritchie

For larger spills, additional off-Post assistance may be required. Local, state and federal authorities available to provide assistance in emergency situations are listed in Table 2.5. These organizations provide assistance in accordance with the mutual aid agreements established between Fort Ritchie and these municipalities and other DOD installations.

It is conceivable that a spill on Post-managed properties could exceed the combined emergency-response capabilities of the Post and surrounding municipalities and installations. A spill exceeding this combined response capability might be quite large or might occur close to running water allowing the spill to evade cleanup attempts. If such an emergency were to occur, it might be necessary to enlist the help of state and Federal agencies such as the Maryland Department of Environment - Emergency Response, U.S. Army Corps of Engineers, NRC, EPA, RRT, or NRT. These agencies usually provide assistance only on an advisory level, but they do have access to trained operations teams that are available for cleanup of large spills.

2.11 Procedures And Techniques To Identify, Contain, Reclaim, And Remove Materials Used In Bulk

Spilled materials will be identified primarily by the history of hazardous substance use and the type of operation being performed in the area of the spill. It is possible, however, that a spill of unknown identity may be discovered and would require identification. In this case, members of the IRT, wearing protective clothing, would attempt to identify the material by available evidence at the scene of the spill. If these attempts fail to determine the identity, the material will be sampled for chemical analysis to determine its identity. Once the material has been identified, cleanup operations will begin.

Spill containment and control operations will be directed as follows by the IR-IOSC.

- If spilled material is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of this area will generally depend upon the size of the spill and the waste involved.
- If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 feet wide and 1000 feet long will be evacuated downwind if quantities of volatile (toxic or combustible) materials are released which result in detectable quantities in the air in this zone. HAZMAT experts will assist the Post Fire Chief and the P-IOSC by providing toxic corridor computations for toxic vapor clouds based on prevailing atmospheric conditions in the spill vicinity.
- As much of the material as possible will be collected using pumps or tank trucks.
- Hay or other sorbent material will be used to absorb the oil that cannot be collected by pumping.
- Contaminated earth, hay, or other absorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- Spill cleanup operations will be directed as follows by the P-IOSC.
- The P-IOSC will determine when the area has been cleaned up sufficiently to be returned to normal service and will obtain approval from the Maryland HSWMA to do so.
- Storage of waste materials resulting from clean-up activities will be temporarily stored as described in Section 2.11.1.
- Hazardous or toxic substances will be disposed of in accordance with Federal, state, or local regulations or instructions from EPA.
- In the event that a spill of hazardous substance or waste results in soil or groundwater contamination, a hazardous substance remedial action program will have to be developed to remove the contamination (to levels acceptable to the Maryland HSWMA).

2.11.1 Storage And Treatment Of Released Material

Fort Ritchie DOL will temporarily store the hazardous waste resulting from a spill, fire, or explosion in accordance with Maryland hazardous waste regulations to the greatest extent possible until the wastes can be transferred to a permitted HWSF or disposal facility.

2.11.2 Incompatible Wastes

The P-IOSC will ensure that wastes accumulated during a cleanup operation are not stored with incompatible wastes already being stored at the Post.

2.11.3 Post Emergency Equipment Maintenance

Following an emergency event, all emergency equipment listed in Table 2.6 will be cleaned or replaced so that it is fit for its intended use. An inspection of all safety equipment will be conducted before operations are resumed. The regional EPA administrator, state, and local authorities will be notified that Post emergency equipment maintenance has been performed and that operations will resume (See Section 2.12.2).

2.11.4 Documentation And Cost Recovery

Documentation will be collected and maintained to support all spill-response actions taken and to form the basis for cost recovery. Documentation should be sufficient to prove the source and circumstances of the incident, the responsible party or unit and impacts, potential impacts to the public health and welfare and to the environment, and on accurate accounting of costs incurred. Documentation should also be collected for scientific study of the environment and for the research and development of improved response technology, where appropriate. The P-IOSC will ensure the necessary collection and safeguarding of information, samples, and reports. Samples and information must be gathered expeditiously during the response to ensure an accurate record of the impacts incurred. Information and reports will be transmitted to the appropriate agencies in accordance with Section 2.12.2 of this document.

2.12 Reporting Procedures

Immediate and nonimmediate reporting requirements in the event of a spill are discussed in this section.

2.12.1 Immediate Spill Reporting Requirements

According to 40 CFR 110.10, as soon as anyone has knowledge of a reportable oil spill, that person shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC and the Maryland HSWMA immediately (see Table 2.5). The HSWMA is to be notified after notification of the NRC. The NRC will notify the USCG and EPA as deemed necessary.

Initial reporting is required to be made no later than two hours after detection of a spill. The following reporting of oil spills (of any size) to the Maryland HSWMA, in accordance with COMAR 26.10.01.03, is also required and must include the items listed below:

- Time of discharge;
- Location of discharge;
- Mode of transportation or type of facility involved;
- Type and quantity of oil spilled;

- Assistance required;
- · Name, address, and telephone number of the person making the report; and
- Any other pertinent information requested by the HSWMA.

In accordance with regulations developed under the CERCLA, spills involving any hazardous substance for which a reportable quantity has been established in 40 CFR 302 and 40 CFR 116, and which is listed under either the Solid Waste Disposal Act, Clean Air Act, CWA, or Toxic Substances Control Act must be reported to the NRC as well as the Maryland HSWMA. The Post EMD also follows the same practice for any substances not listed in the acts noted above but classified as a hazardous waste under RCRA.

If two reportable spills (as defined in the second paragraph of this section above), occur within any 12-month period, the facility must submit a detailed corrective action plan (including a current copy of the ISPC and SPCC) to the regional EPA administrator within 60 days of the occurrence of the second spill.

2.12.2 Required Written Reports

Any reportable spill will be reported in writing within 10 working days to the Maryland HSWMA using the Reporting Form for Emergency Events (Exhibit 2.3). It also will be recorded in the operating record, including the time, date, and details.

The regional EPA administrator and state and local authorities shall be notified that post-emergency equipment maintenance has been performed and that operations will resume.

2.13 Resources For RRT For Spill Not Caused By The Army

AR 500-60 directs that resources will be made available to a Regional Response Team when requested for cleanup of a spill not due to Army activities. These resources are listed in Tables 2.6.

2.14 Safety Precautions For Known Hazardous Substances

MSDSs for known hazardous substances handled on the Post-managed properties must be maintained at the Fort Ritchie Safety Office and at each facility where the hazardous substances are used.

2.14.1 Personnel Safety

Safety is of primary concern during response to a spill event. IRT personnel will be properly trained in safety procedures prior to their being allowed to participate in spill-response activities. Proper protective clothing that is consistent with the type of spill and the expected exposure level will be worn. Personnel making initial entry to a site with unknown conditions should be provided with approved pressure-demand, SCBA, appropriate chemical resistant clothing, and two-way radio communications.

A periodic health-monitoring program will be established for all military and civilian personnel, including project managers employed or otherwise responsible for carrying out official duties at oil and hazardous substance spill sites as required by OSHA.

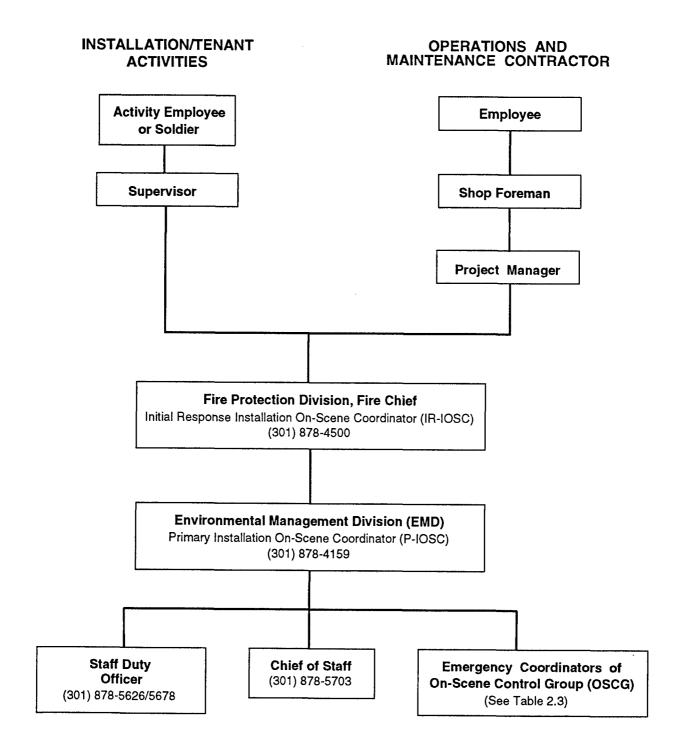
2.14.2 Site Safety

A spill site must be controlled to prevent or reduce the possibility of exposure to contaminants and the transport of hazardous substances from the site. The P-IOSC will ensure that the spill areas are evacuated and that a disaster cordon is established.

2.14.3 Evacuation Plans

An evacuation plan for facility personnel is required in facilities and buildings where there is a possibility of hazardous substance spills. Each building plan must describe signals to be used to begin evacuation, evacuation routes, alternate routes, and assembly points. Each building Fire Marshall will be responsible for posting evacuation routes at strategic locations and ensuring that building personnel are familiar with procedures.

Figures, Tables and Exhibits: Fort Ritchie - Main Post and Other Properties in Maryland



Note:

Each person notifies the next person in the diagram. (employees will contact the Fire Dept. when supervisors are not available)

Figure 2.1. Spill notification sequence - U.S. Army, Fort Ritchie, Maryland

Table 2.1. Spill response sequence for operations and maintenance contractor personnel - Fort Ritchie

Step	Responsible Person	Action
1	O&M¹ Contractor personnel noticing a spill	Report to O&M Contractor Shop Foreman (or other supervisory personnel) the location, circumstances, quantity, and type of substance spilled.
2	O&M Contractor Shop Foreman	Assess the situation and notify O&M Contractor Project Manager. Call Fire Dept. if conditions obviously require assistance.
3	O&M Contractor Project Manager	Assess the situation and notify the O&M Contractor QA/Safety Manager. Fort Ritchie policy is that all spills also will be reported to the Fire Department.
3b	O&M Contractor QA ² /Safety Manager	Notify Fort Ritchie Fire Chief for assistance at (301)878-4500.
4	O&M Contractor Shop Foreman	Prepare required after-action reports.

¹Operating & Maintenance

Table 2.2. Spill response sequence for fuel and hazardous substance spills at post and tenant activities - Fort Ritchie

Step	Responsibility	Action
1	Personnel noticing a spill	Report to Supervisor the location, circumstances, quantity, and type of substance spilled.
2	Supervisor	Assess the situation and notify Fort Ritchie Fire Chief for assistance at (301)878-45001.
3	Supervisor	Prepare required after-action reports.

¹When dialing from a Fort Ritchie Main Post telephone, only the last four digits need to be dialed.

²Quality Assurance

Table 2.3. Emergency coordinators and members of on-scene control group - Fort Ritchie

Contact	Duty Hours Phone Number ¹	Duty Hours Address	Off-Duty Hours Phone Number	Off-Duty Hours Address
Fort Ritchie Garrison Commander	(301)878-5626	Bldg. 200		
Fire Dept. Chief ² (Mr. Wolfe) Fire Dept. Asst. Chief (Mr. Carl Grove ³)	(301)878-4536 (301)878-5295	Bldg. 502 Bldg, 502	(301)878-3088 (717)794-2624	
Environmental Management Division (Mr. Hofmann) (Mr. Phil Marne ³)	(301)878-4159 (301)878-4190	Bldg. 603 Bldg. 603	(717)762-8681 (717)762-1360	
O&M Contractor (M.L. Brown, Project Manager) (Tommy Gilbert, Roads and Grounds) (Mr. Enloe) (Ms. Bunker)	(301)878-4257 (301) 878-4241 (301) 878-4839 (301) 878-4256	Bldg. 601		
Directorate of Personnel and Community Affairs	(301)878-5233	Bldg. 346	Duty Officer (301)878-5626/5678	
Public Affairs Office ²	(301)878-5874	Bldg. 343	Duty Officer (301)878-5626/5678	
Director of Health Services (Ms. Tomczak)	(301)878-5786		(717)532-9531	
Health Clinic	(301)878-4132 -5439	Bldg. 341	(301)878-4500	Bldg 341
Directorate of Logistics	(301)878-5769	Bldg. 837/833	Duty Officer (301)878-5626/5678	
Staff Judge Advocate	(301)878-5771	Bldg. 330	Duty Officer (301)878-5626/5678	
Provost Marshall's Office ² (PMO)	(301)878-5094	Bldg. 123	Post MP (301)878- 4500/5050	Bldg 123
Garrison Commander	(301)878-5703	Bldg. 304	Duty Officer (301)878-5626/5678	
Safety ² (Mr. Whitney)	(301)878-5833	Bldg. 311	(717)352-8477	

¹When calling from a Fort Ritchie Main Post telephone, only the last four digits need to be dialed.

²Member of Initial Response Term (IRT)/On-Scene Control Group (OSCG)

³Alternate to primary member of IRT/OSCG

Table 2.4. Organizations to be contacted in case of emergency Fort Ritchie managed properties in Maryland

Emergency	Organization/Agency	Emergency Phone Number ¹
Injury	Fort Ritchie Health Clinic	(301)878-4500
Fire/Explosion	Fort Ritchie Fire Dept.	(301)878-4500
Hazardous Substance Spill or Release	Fort Ritchie Fire Dept.	(301)878-4500

¹When dialing from a Fort Ritchie telephone, only the last four digits need to be dialed.

Table 2.5. Outside agencies to be notified in the event of an oil or hazardous substance spill'

Fort Ritchie managed properties in Maryland

Emergency	Organization/Agency	Emergency Phone Number
	Washington County Central Alarm and HIRT, (non-emergency)	(301)791-1211
	Maryland Emergency Response	(301)974-3551
If spill reaches navigable waters	National Response Center ² 24-Hour Emergency Number	
	Emergency Management Agency (EMA) 24-Hour Emergency Number	(800) 843-0699
Advisory contracts	Maryland Dept. of Natural Resources	(301) 824-2702
based on extent of emergency	Maryland Department of the Environment (Emergency Response)	(301) 974-3551
	Maryland State Fire Marshall	(301) 791-4758
	U.S. Coast Guard Emergency Response Center 24-Hour Emergency Number	(804)398-6638
	Chemical Transportation Emergency Center (CHEMTREC)	(800) 424-9300
	U.S. Environmental Protection (USEPA) Region III 24-Hour Emergency Number	(215) 597-9898
	Hazardous Material Technical Center	(800) 638-8958
	USEPA Hazardous Substance Spill Response Team	584-3554/3816 (DSN)
	U.S. Army Toxic and Hazardous Materials Agency (USATHAMA)	(301) 671-4714/2427
	U.S. Army Corps. of Engineers (Baltimore)	(301) 828-5195
	U.S. Army Environmental Hygiene Agency	584-3651 (DSN)

¹EMD is authorized to be the point-of-contact for outside agency notification.

²Report required for all spills.

Table 2.6. Resources available for response to spills at Fort Ritchie managed properties and Site R

Quantity	Resource	Controlling Party
	Equipment and Personnel	
1 1 3 1	Front-end loader and operator Bobcat and operator Dumptruck and operator Backhoe and operator	DEH
1 1 2 3 1 1 4	Backhoe and operator Front End Loader and operator Dumptruck and operator Pickup Truck and operator Street Sweeper and operator Road Grader and operator Tractor and operator	ColeJon
4 1 1 1 1	Equipment Fire Engines, 1000gpm, w/in line foam systems Crash Truck, All wheel drive, w/ 200gals of foam Tanker, 1300gal Utility Truck, Used to carry spill supplies Rescue Unit, w/ the following hazmat supplies Plug Kit Non-Spark tool kit Chlorine "A" Kit Brooms Shovels Gas Detector Spill Containment Trailer	Fort Ritchie Fire Dept.
24 10 4 54 100 24 78 30 3 40 6 1 48 2	Other Hazmat Supplies Snakes - General Liquids Snakes - Oil Water Booms Pillows Pads Mini Booms Sorbent C, bag Clay, bag Soda Ash, bag General Sorbent, bag Spill X Acid Neutralizer, pail Containment Boom Tyvek Suits Over Pak Drums	Fort Ritchie Fire Dept.

Table 2.6. Resources available for response to spills at Fort Ritchie Manage Properties and Site R (cont.)

Quantity	Resource	Controlling Party
	12 Foot Emergency Response Mini Unit Trailer	
1	PIG SKIMMER absorbent sock (3"x46"), 10/box	Fort Ritchie Fire Dept.
1	PIG SKIMMER absorbent boom (3"x10"), 6/box	-
1	PIG SKIMMER absorbent boom (5"x10"), 2/box	
1	PIG SKIMMER absorbent boom (8"x10"), 2/box	
1	PIG SKIMMER absorbent pillow (12"x24"), 10/box	
2	SKIMMING PIG mat sheets (16.5"x20"), 100/box	
1	#BOM202-Spaghetti Boom (8"x10"), 4/bale	1
3	#BOM203-Spaghetti Boom (5"x10"), 4/bale	
1	#124CR-HAZ-MAT PIG absorbent sock (3"x46')12/box	
1	#PIG301-HAZ-MAT PIG absorbent sock (3"x10')6/box	
1	#HA1010-HAZ-MAT PIG absorbent dike (5"x10')2/box	
1	#HA2010-HAZ-MAT PIG absorbent dike (5"x10')2/box	
2	#MAT203-PIG mat sheets (16.5"x20"), 100/bale	
1	#HR7015-HAZ-MAT PIG pillow (17"x16"), 10/box	
4	#2048-Blue PIG absorbent socks (3"x46"), 20/box	
1	#PTY201-PIG putty epoxy putty, case	
2	#PAK302-20-Gal. Overpak, 1/box	
1	#GEN305-Non-Sparking shovel (14"Wx41"L), 1/box	
1	#GEN301-Caution Poly bags(18"Wx30"H), 100/bale	
1	#MA3636-SPILSTOPPER (36"x36"), 1/box	

Table 2.7. Communication facilities available during a spill emergency at Fort Ritchie managed properties and Site R

1) 5	The second section		
1) Equipment: 5 - Base station			
P R A C	Mobiles - 23 Portable - 59 Remote - 3 Antennas - 5 Chargers 34 Command Console - 1		
2) Installa	tion Switchboard Terminated Systems:		
a) b) c)	Defense Switched Network (DSN) 22 circuits, overflow to Site R.		
3) Fort Ri	chie EOC capabilities:		
a)	Military Police	F-1 - (149.865 Mhz) F-2 - (149.600 Mhz) F-3 - (149.725 Mhz) F-4 - (30.18 Mhz) F-5 - (150.750 Mhz)	
b)	Fire Department	F-1 - (150.750 Mhz) F-2 - (46.16 Mhz) F-3 - (46.10 Mhz) F-4 - (46.36 Mhz) F-5 - (149.865 Mhz) F-6 - (148.900 Mhz)	
c)	DEH	(148.900 Mhz)	
d)	Washington County	(39.18 Mhz)	
e)	Franklin County Fire	(46.16, 46.10, 46.36 Mhz)	
f)	State Police	(on request)	
4) M	ARS Systems (Located in Bldg 141).		
Н	F SSB Communications		

Exhibit 2.1. Fort Ritchie Spill Report¹

Item	Information
1.	Name, location, and type of function of installation.
2.	Commander of installation and phone number.
3.	Name and phone number of person making report.
4.	Type and estimated amount of material. Severity of incident.
5.	Location of spill. Specify areas effected by spill.
6.	Local discovery time and date of incident.
7.	Receiving stream or waters.
8.	Cause of incident and equipment/facility involved.
9.	Injuries and/or property damage.
10.	Duration of discharge.
11.	Remedial actions taken and estimated completion date.
12.	Agencies notified.
13.	Samples taken (yes or no).
14.	Potential dangers (fire, explosion, toxic vapor, etc.).
15.	Assistance required.
16.	Anticipated or actual reaction by news media and public to the incident.
17.	Other items required in the regional contingency plan and a general discussion of the incident. See Chapter 9 of AR 200-1 for further discussion.

¹Based on AR 200-1 requirements for telephone reports on spill emergency (to next higher HQ, AOC, USATHAMA, LEPC and NRC)

Exhibit 2.2. Oil and Hazardous Substances Spill Notification Information Fort Ritchie, Maryland

	following information will be provided by memorandum to EMD following the discovery and initial honic reporting of the spill:
1.	Time spill occurred or was first observed:
2.	Name of person first observing spill:
3.	Location of initial spill and present location if moving:
4.	Type of spilled material:
5.	Estimate of amount spilled or rate of release if continuing:
6.	Environmental conditions - (e.g., wind direction and speed, wave action, and currents):
7.	If from mobile container (e.g., pod, tanker, railway tanker), identity of vehicle, unit, owner (if other than the U.S. Army), and capacity:
8.	Description of area likely to be affected by spill (e.g., river banks, lakes, land areas, or wildlife areas):
9.	Cause of spill, if determined:
10.	Action taken to combat spill, if any:
11.	Activities or authorities notified:

Exhibit 2.3. Reporting Form for Emergency Events - Fort Ritchie Managed Properties in Maryland.

Note: This form is to be prepared and submitted by Environmental Management Division.

Name, address, and phone number of owner or operator:
Name, address, and phone number of facility where spill occurred:
Date, time, and type of incident (e.g., fire, explosion):
Name and quantity of material(s) involved:
A complete description of circumstances contributing to the spill:
Assessment of actual or potential hazards to human health or the environment (if applicable):
Contaminant removal and clean-up operations. Estimated quantity and disposition of material recovered: from the incident:
Procedures, methods, and precautions instituted to prevent recurrence:
Certification that the information provided in true and correct:

Send to: Maryland Hazardous and Solid Waste Management Administration U.S. EPA, Region III Regional Administrator (EPA)

3.0 ALTERNATE JOINT COMMUNICATION CENTER (SITE R) ADAMS COUNTY, PENNSYLVANIA

The U.S. EPA has promulgated regulations (40 CFR 109) which establish requirements for the preparation and maintenance of this ISCP document. These regulations are implemented and enforced by the U.S. EPA only. However, in the state of Pennsylvania, the Department of Environmental Resources (DER) requires that owners of regulated petroleum storage tank facilities, with aboveground storage capacity of greater than 21,000 gallons submit a Spill Prevention Responses (SPR) plan to the DER. The SPR plan requires a specific downstream notification requirement which is provided in Appendix A of this ISCP. In addition, this ISCP provides a consolidated presentation of the information required by both U.S. EPA for an ISCP as well as all other information required by the Pennsylvania Storage Tank and Spill Prevention Act as specified in regulations of Section 25 of the Pennsylvania Code, Chapter 245, Subchapter L. This presentation is provided with as little deviation as possible from the format suggested by the DER in guideline documents while still providing all information for this ISCP required by U.S. EPA regulations.

3.1 Provisions Specifying Responsibilities And Duties For Spill Containment And Cleanup At Site R

The responsibility for prevention of oil and hazardous substances spills at Site R lies ultimately with the 1111th Signal Battalion Garrison Commander. A chain of command has been established, however, to ensure compliance with the various components of this ISCP. In addition, a reporting sequence is established to ensure that, when an incident occurs, the proper personnel are notified so that appropriate actions are taken. Use of the notification sequence (see Figure 3.1) and appropriate actions of the responsible parties (Tables 3.1 and 3.2) should minimize the impact of a spill occurrence.

Close coordination between departments and agencies involved in response to a discharge or spill event is imperative to ensure proper and complete remedial action. For the majority of environmental episodes expected to occur at Site R, this coordination will take place between the Site R (and Fort Ritchie if necessary) Fire Departments and the Environmental Management Division (EMD). The Fort Ritchie Fire Chief is the Initial Response Emergency Coordinator (EC) or Initial Response Installation On-Scene Coordinator (IR-IOSC). The primary EC or Primary IOSC (P-IOSC) is the base Environmental Coordinator, who is also a representative of the EMD. The names, phone numbers, and addresses of all personnel acting as Fort Ritchie and Site R emergency coordinators are shown in Table 3.3.

Spill-containment or cleanup efforts will be performed by the Installation Response Team (IRT). The IRT acts as the facilities emergency response team performing functions as identified, directed, and coordinated by the IOSCs.

The IRT consists, at a minimum, of the:

- IOSC (or Alternate IOSC),
- Fort Ritchie and Site R Fire Departments,
- EMD,
- · Safety Officer,
- Security Division Military Police (MP),
- · Public Affairs Office (PAO), and
- Maintenance Division.

These participants are the minimum IRT. The persons and/or organizations listed below have the responsibility of implementing this plan, and include the minimum IRT members as well as other organizations which may be required by the P-IOSC to participate. Since spills could occur at different facilities, affecting different personnel, only those organizations or people involved in spill response for a particular spill area would need to respond.

The order of the following discussion of responsibilities is from employees up through supervision rather than the traditional highest to lowest order. This is done to present the information in the same order as the notification sequence for responders who may need more information on their responsibilities. When Fort Ritchie organizations serve in the same capacity for both Fort Ritchie and Site R, this is indicated by the heading for that description.

3.1.1 Site R Personnel

All Site R personnel bear some responsibilities during a spill event. The following subsections delineate those responsibilities according to personnel category.

3.1.1.1 Employee

Each employee at Site R has the following responsibilities:

- Notify a supervisor immediately after finding or observing an oil or hazardous substance spill.
- Do not touch the spilled material.
- Restrict access to the spill area.
- Evacuate area if spill is a known hazardous substance stay upwind.
- Remove ignition sources.
- If a supervisor cannot be quickly located, call the Site R Fire Department to notify them of the situation (see Fig. 3.1 and Table 3.1).
- Assist as directed by supervisor in the control and/or cleanup of spills.

3.1.1.2 Site R Fire Department

The Site R Fire Department (along with the Fort Ritchie Fire Department if needed) is responsible for coordinating control and cleanup efforts for spills of oil or hazardous substances. The Fort Ritchie Fire Chief is also the IR-IOSC with duties that include:

- leading the IRT;
- evaluating information received to determine the character, source, extent, and nature of the oil or hazardous substance spill. Ascertain spill reporter's name, call back number, and any action taken to contain the spill;
- notifying the EMD of a spill;
- coordinating spill-containment and control efforts;
- providing for fire-fighting assistance if required;
- coordinating emergency-response actions until relieved by the P-IOSC;
- indicating the need for the evacuation of personnel with the MP, 1111 Security Division;
- directing the training exercises that are required at least once annually;
- maintaining and operating the on-scene Mobile Command Post (MCP); and
- calling for reinforcements if necessary.

The Fire Department, in most cases, will be the initial responder to hazardous spills due to their alerting system and rapid response capabilities. The Fire Chief will direct the firefighters, within the realm of standard practices and good common sense, to contain and control the spill, and will have final word on the commission of personnel to any action taken in controlling and containing a spill. Once the spill is contained and controlled the P-IOSC will take charge of the cleanup.

3.1.1.3 P-IOSC [Chief, Environmental Management Division (EMD)], (Fort Ritchie)

The P-IOSC performs the following:

- He identifies the spilled quantity and type and assesses the consequences of all oil and hazardous substance spills on Post-managed properties;
- He coordinates and directs Army control and cleanup efforts at the scene of any oil or hazardous substance discharge on Fort Ritchie controlled properties. Responds to oil or chemical spills and ensures cleanup and decontamination procedures are carried out correctly. Mobilizes personnel and equipment for control and containment of spills with the authority of the IC.
- He ensures that the Fort Ritchie Fire Department responds immediately if a spill poses a significant threat of fire, explosion, or the release of contamination to the environment (If a smaller spill occurs,

the coordinator will assist and provide guidance in the proper cleanup method for the spill.). Calls for reinforcements as necessary in performing this task.

- He keeps the Director of DEH and IC continuously informed of the situation during a spill event;
- He indicates the need for evacuation of personnel in the area to the Site R MP 1111 the Security Division, and has the personnel meet at a predetermined location. He must account for all personnel.
- He inspects spill-control equipment quarterly at each facility.
- He performs periodic tests and drills to verify the effectiveness of the ISCP.
- He attends hazardous substance training courses and keeps abreast of current policies and regulations.
- He certifies when the area can be returned to normal use after a chemical spill has been cleaned up.
- He ensures that employees receive training in the proper action to be taken if a spill occurs. He
 ensures proper training for the IRT and the individuals responsible for small spills (less than 5 gal of
 oil or hazardous substance) at various Post facilities.
- He reviews the ISCP at least once every 3 years and updates the ISCP to assure that it is current and responsive to the activities and operations performed at the Post. Any modifications to the ISCP are to be completed within 6 months of the change prompting the modification.
- He notifies the Site R Commander and the IRT leader in the event that IRT assistance is required for spill containment and cleanup.
- He determines whether a spill is reportable under Federal and Pennsylvania regulations as described in Section 3.2.1 and notifies authorities of a spill event within the appropriate time frame. The EMD is authorized to contact all necessary outside agencies with approval by the IC (Table 3.5).

3.1.1.4 Directorate of Engineering and Housing (DEH), (Fort Ritchie)

The Chief of DEH is responsible to the IC to confirm, classify, and technically supervise control and cleanup of spills at Post-managed properties. His responsibilities include:

• providing the resources necessary for the EMD and Fort Ritchie Fire Department to carry out their duties in accordance with this plan;

- providing for emergency power and water if they are required during an emergency; and
- establishing procedures for mapping and surveying disaster areas.

3.1.1.5 Leader, IRT (Fort Ritchie)

The IRT leader is the Fort Ritchie Fire Chief. His duties include:

- regularly inspecting and becoming familiar with the various Post facilities and the chemicals, hazardous materials, and wastes used at each;
- regularly inspecting the spill-control equipment at each facility to ensure all equipment is accounted for and operable;
- attending all training sessions concerning spill control;
- responding to all calls involving fuel, oil, or hazardous substance spills (the IRT leader will contact other team members when a spill alert occurs.); and
- maintaining the IRT.

3.1.1.6 1111th Security Division, Site R

Site R MP security, in coordination with Fort Ritchie MP security division, will assume responsibility for control of non-essential personnel, on-lookers and traffic. Site R security personnel will be primarily responsible for protection of, and restriction of access to, classified information and areas. The senior security officer will coordinate with the IOSCs and the PAO on the admittance of news media and photographers and with the IRT command post in the establishment of security perimeters, evacuations, and protection of government property, including the following:

- providing off-post convoy escorts for the movement of response teams responding in accordance with the NCP;
- providing security at the scene of all accidents or incidents/disasters involving U.S. Army resources
 on the Post;
- establishing and marking the on-scene, entry-control point (ECP) when directed by the IOSC, at emergency or disaster locations;

- coordinating actions between the Post and all local law enforcement agencies;
- coordinating evacuation operations, if necessary; and
- assisting local law enforcement personnel with crowd control, if requested to do so.

3.1.1.7 Installation Commander, 1111th Signal Battalion, Site R

The IC is responsible to:

- be the Chief of the Emergency Operations Staff;
- assume overall responsibility for the Post's Disaster Preparedness Program;
- ensure that an EET is established to evaluate local exercises; and
- establish the IRT.

3.1.1.8 Operations Division

The Site R Operations Division will:

- · develop, maintain, and monitor a Post Disaster Preparedness Program;
- coordinate to ensure timely, realistic exercises and evaluations;
- coordinate with local emergency planning officials; and
- maintain close contact with local authorities to ensure that plans and procedures of mutual interest are coordinated.

3.1.1.9 Public Affairs Office (Fort Ritchie)

The PAO will coordinate with the IOSC to prepare any news release pertaining to a spill. Any news release will be approved by the IC before release to the media. Upon the direction from the IC and IOSC, the PAO will prepare an immediate news release if circumstances dictate that the spill could endanger the health and safety of the public or if an evacuation is necessary. Other PAO responsibilities include:

- Act as the Office of Primary Responsibility for the release of all information to the public news media
 and/or other nongovernmental personnel. The PAO will be the Post's releasing authority for
 information to media, whether that information is initiated by the Post or in response to query. This
 will include requests for interviews with and/or statements from personnel involved in a mishap.
- Activate a press center during emergencies/disasters either at the scene of the emergency or at a designated building.
- Receive initial notification of all accidents, incidents, or emergencies and dispatch a representative to the scene of the emergency.
- Accompany the P-IOSC to off-site accidents.

3.1.1.10 Directorate of Logistics (Fort Ritchie)

Directorate of Logistics (DOL) is responsible for:

- ensuring that appropriate agencies are informed of storage and/or movement of dangerous material on the Post; and
- providing the supplies, services, maintenance, and transportation needed to support this ISCP.

3.1.1.11 Director of Information Management (Fort Ritchie)

The Site R Director of Information Management will:

 provide high frequency radio capability and qualified operators to the Command Operations Center (COC).

3.1.1.12 Resource Management Division (Fort Ritchie)

The Site R Resource Management Division must:

• maintain procedures to assure that each activity involved in supporting civil agencies during disasters accounts for all supplies and services for which the Army can be reimbursed; and

• accumulate all expenditures incurred in support of disaster response, for reimbursement.

3.1.1.13 Chief, Office of Acquisition (Fort Ritchie)

Responsibilities of the Chief, Office of Acquisition include:

- providing emergency procurement actions; and
- ensuring that all contractors currently assigned to the Post are provided with disaster preparedness information.

3.1.1.14 Safety Division (Fort Ritchie)

The Safety Officer is responsible for the safe personal conduct of individuals involved in spill control and cleanup operations. The Safety Officer oversees all operations for application of all required safety precautions. The Safety Officer also will see that applicable Material Safety Data Sheet(s) (MSDS) are available at sites where those materials are used.

3.1.2 Maintenance Division, Site R

The Site R Maintenance Division provides mechanical, electrical, and small construction services on Site R properties.

3.1.2.1 Employee

Employee duties are to:

- 1. Notify the Shop Foreman or a supervisor or other person in a position of authority immediately after finding or observing a fuel or hazardous substance spill; or
- 2. If the Shop Foreman or a supervisor cannot be quickly located, call the Site R Fire Department to notify them of the situation (Fig. 3.1, Table 3.1); and
- 3. Assist, as directed by supervisor, in the control and/or cleanup of spills.

3.1.2.2 Shop Foreman

Shop Foreman shall:

- inspect daily fuel or hazardous substance tanks and drums for leaks, spills, or damage;
- notify the project manager, or next level of supervision in the event of a spill.

3.1.2.3 Project Manager/Supervisors

The Project Manager or Supervisor will ensure that:

- inspections are performed daily for the detection of fuel or hazardous substance, leaks, or spills;
- notify the Site R Fire Department (ext. 777) or the Fort Ritchie Fire Chief (at 4500) of all spills if needed; and
- be responsible to the IC for all matters regarding oil or hazardous substance spill and spill prevention.

3.2 Immediate Spill Response Actions - Site R

This section indicates the specific actions to be taken in the event of a spill at Site R. It includes procedures for spill discovery, the spill-notification process, and spill-response. Both oil and hazardous substance spills are covered by this Plan. Since the spill plan requirements for hazardous substance spills are somewhat different than those of oil spills, discussion of the responses will be handled separately.

3.2.1 Spill Definitions

A spill is broadly defined as a release of any kind of a petroleum product or hazardous substance to the environment. Spill reaction is based largely on the nature and quantity of the material spilled. For purposes of defining spills for reporting purposes to the Pennsylvania DER, the Pennsylvania Storage Tank and Spill Prevention Act refers to amounts equal to or greater than the reportable quantities determined in U.S. EPA regulations for the designation of hazardous substances, reportable quantities, and notification requirements under CERCLA and CWA (40 CFR 302 and 40 CFR 116 respectively). In addition, 40 CFR 110.3(b) defines a reportable spill (or discharge) as any quantity which is determined to be "harmful" and may include quantities which "cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shoreline" of any body of navigable water. In order to ensure compliance with the Pennsylvania clean Streams Law and Storage Tank and Spill Prevention Act and regulations implementing these laws, all spills will be reported to the DER which are determined to be potentially harmful. The EMD is the only party authorized to report spills to the National Response Center (NRC) as required by 40 CFR 110 or to the Pennsylvania DER. The reporting of hazardous substance spills is required as specified under the CERCLA and the CWA regulations, 40 CFR 302 and 40 CFR 116 respectively.

3.2.2 Spill Discovery

The initial component in the spill-response plan is discovery. The primary responsibility of a discoverer is to notify the proper authorities, who are trained and equipped to deal with an environmental episode. When a spill is discovered, the person discovering the spill takes the following actions:

- 1. Take action to stop the source of the spill if he is properly trained to do so and if it can be done safely.
- 2. Begin the notification process shown in Figure 3-1.

3.2.3 Assessment

During every step of the spill-response process, each responding individual will continually assess the situation and will make decisions on the next appropriate action to be taken. Upon initial discovery, the

discoverer and/or the supervisor will provide the following information as completely as possible to help the IR-IOSC assess the magnitude and potential seriousness of the spill or release:

- 1. Time and type of incident (e.g., release or fire)
- 2. Name and quantity of spilled material involved (to the extent known) and the rate of release
- 3. Direction of the spill and vapor, or smoke released
- 4. Fire and/or explosion possibility
- 5. Coverage area of spill and the intensity of any fire or explosion
- 6. The extent of injuries, if any

The IR-IOSC will determine the appropriate response based upon the potential risks associated with the spill and whether an imminent or actual threat exists to human health or the environment. Below are decision-making criteria to provide guidance to the IR-IOSC in making this determination. The appropriate notifications will be made, and the IRT will be mobilized to control, contain, and clean up any spilled material if any of the following conditions occur:

- the spill could result in the release of flammable or combustible liquids or vapors, causing a potential for a fire or gas explosion hazard;
- the spill could cause the release of toxic liquid or fumes;
- the spill can be contained on the site, but the potential exists for groundwater contamination; and/or
- the spill cannot be contained on the site, resulting in off-site soil contamination and/or ground- or surface-water contamination.

3.2.4 Response Phases For Oil Spills

Defensive actions should begin as soon as possible to prevent or minimize the potential risk to public health and/or the environment. See Tables 3.1 and 3.2 for immediate response actions for oil/fuel spills or spill of other types of hazardous substances. The following general actions must be employed:

- 1. Eliminate sources of spark or flame.
- 2. Control the source of the discharge.
- 3. Place physical barriers such as berms or dikes to deter the spread of oil.
- 4. Prevent the discharge of contaminated water into the storm drain or sewer system.

- 5. Recover the oil or minimize its effects.
- 6. Recovered oil and contaminated adsorbents, rags, etc., must be placed in DOT-approved containers and disposed of as hazardous waste as applicable

3.2.4.1 Oil/Fuel Spill Discovery, and Containment

Control and contaminant operations shall be directed as follows by the IR-IOSC.

- 1. If spilled material is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of this area will generally depend upon the size of the spill and the waste involved.
- 2. If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 ft wide and 1000 ft long will be evacuated downwind if any measurable quantities of volatile (toxic or combustible) materials are detected in the air.
- 3. As much of the material as possible will be collected using pumps or tank trucks.
- 4. Hay or other absorbent material will be used to absorb the oil that cannot be collected by pumping.
- 5. Contaminated earth, hay, or other absorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- 6. The P-IOSC will determine when the area has been cleaned up sufficiently for the area to be returned to normal service.
- 7. Oil contaminated dirt may be disposed of in a solid waste landfill designated for that purpose, if oil contaminant levels are within applicable Pennsylvania DER regulatory limits for landfill disposal.

When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or otherwise blocked off.

According to 40 CFR 110, as soon as anyone has knowledge of a reportable oil spill, the discoverer shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC immediately after approval by the IC (see Table 3.5). The Pennsylvania DER is to be notified after notification of the NRC. The NRC will notify USCG and EPA as necessary.

3.2.5 Response Phases For Hazardous Substances Spills

Defensive actions should begin as soon as possible to prevent or minimize damage to public health or welfare or to the environment. See Table 3.2 for immediate response actions for spills of hazardous substances. The following general actions must be employed:

- 1. Eliminate sources of spark or flame.
- 2. Control the source of the discharge.
- 3. Place physical barriers such as berms or dikes to deter the spread of the hazardous substance.
- 4. Prevent the discharge of contaminated water into the storm drain or sewer system.
- 5. Recover the hazardous substance or minimize its effects.
- 6. Place recovered material and contaminated absorbents, rags, etc., in DOT-approved containers and disposed of as hazardous waste as applicable.

3.2.5.1 Hazardous Substance Spill Discovery

When a spill occurs or is discovered the discoverer will immediately notify his supervisor. The supervisor will consult with the Post Fire Chief to determine whether the containment and its cleanup are within the capability of the organization reporting the spill. This mandatory telephone notification will be followed by a memorandum notification to DEH with the data from an Oil and Hazardous Substances Spill Notification Information form (Exhibit 3.2).

The IR-IOSC should conduct a site visit, if this can be accomplished safely. If appropriate response actions are being undertaken by the person or unit responsible for the discharge, the IR-IOSC will provide surveillance and any requested assistance. If effective actions are not being taken, or if the responsible party is unable to deal with the discharge, the IR-IOSC will then initiate the IRT.

The IR-IOSC will immediately identify the character, exact source, amount, and area or extent of the release. Hazardous substances at Fort Ritchie are stored in industry approved hazardous substances storage sheds according to their hazardous characteristics, and a record is kept of all wastes and containers placed in each storage shed from which identification could be made. For hazardous substances stored on a regular basis, the host organization will develop specific spill responses designed for each hazardous substance or hazard category, whichever is most appropriate. If for some reason the released substance cannot be identified by matching visual observation with operating log records, then samples will be collected for chemical analysis.

Immediate notification of reportable spills is directed by 40 CFR 110. As soon anyone has knowledge of a reportable oil spill, that person shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC and the Emergency Management Agency (EMA) office immediately after approval by the IC (see Table 3.5). The Pennsylvania DER is to be notified after notification of the NRC and the EMA. The NRC will notify USCG and EPA as necessary.

3.2.5.2 Control and Cleanup of Hazardous Substance Spills

Immediate removal of spilled hazardous substance will be started as soon as the IR-IOSC determines that the initiation of immediate removal action will not pose an unreasonable risk of harm to human life or health. Immediate control measures associated with spill cleanup may include:

- · recommending the evacuation of threatened individuals;
- rendering the spilled substance less hazardous by neutralization, elimination of spark sources, blanketing with foam, etc;
- controlling the source of release;
- placing physical barriers such as berms or dikes to control or stop the spread of the release;
- controlling water discharge both upstream and downstream of the spill;
- fencing or roping off the contaminated area;
- Bennett & Myer, 1952collecting spilled substance by absorption, pumping, etc;
- moving hazardous substances off the site for storage or disposal;
- providing alternative water supplies; and/or
- collecting and analyzing samples to determine the source and dispersion of the hazardous substance.

Cleanup operations will be directed as follows by the IR-IOSC:

- 1. If the spilled substance is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of the area will generally depend upon the size of the spill and the waste involved.
- 2. If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 feet wide and 1,000 feet long will be evacuated downwind if any measurable quantities of volatile (toxic or combustible) materials are detected in the air.
- 3. As much of the hazardous substance as possible will be collected using pumps or tank trucks.
- 4. Hay or other absorbent material will be used to absorb the substance that cannot be collected by pumping.
- 5. Contaminated earth, hay, or other absorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- 6. The P-IOSC will determine when the area has been cleaned up sufficiently to be returned to normal service.

- 7. Hazardous or toxic substances resulting from a spill, fire, or explosion will be packaged, stored and disposed of in accordance with Federal, state, or local regulations or instructions from EPA. Since Site R does not maintain a permitted Hazardous Waste Storage Facility (HWSF), 90-Day Accumulation Areas, Satellite Accumulation Sites or other Resource Conservation and Recovery Act (RCRA) storage areas, storage of wastes will be in the approved hazardous material storage sheds unless other appropriate areas are set up.
- 8. In the event that a spill of hazardous substance or waste results in soil or groundwater contamination, a hazardous substance remedial action program must be developed to remove the contamination (in accordance with cleanup levels specified by the Pennsylvania DER).

When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or otherwise blocked off.

3.3 Identification Of Resources Available To The Regional Response Team (RRT) For NCP

Site R is required to provide assistance to outside organizations if requested by EPA or USCG. AR 500-60 provides policy and guidance for Army response according to the NCP.

When requested, Site R will provide personnel and equipment to the RRT or the National Response Team National Response Team (NRT) for containment and cleanup of spills not caused by Army activities. Site R will respond to such a request by supplying the same level of resources as available for on-site emergencies. Available resources are indicated in Table 3.6.

Resources are to be supplied as support for outside agencies. Authority for the control and coordination of outside cleanup efforts will be the responsibility of the local authorities in charge. The Army organization involved with the response action retains command authority over its Army personnel.

3.4 Name And Responsibilities Of IOSC

AR 200-1, item 1-25i (13) requires that an P-IOSC be appointed by the IC and adequately trained and prepared to act according to NCP requirements.

The P-IOSC has primary responsibility for response actions following a spill and will coordinate response plans with the regional response team (RRT), state, and local representatives. The P-IOSC will:

- 1. ensure that IRT is alerted, assembled, and dispatched to the accident scene;
- 2. report to the accident scene or convoy as applicable;
- 3. ensure proper location of MCP and relocation if necessary;
- 4. upon arrival, receive briefing on action taken from the Fire Chief (who is the IR-IOSC), and other personnel and assume command;

- 5. ensure the presence of essential personnel and equipment;
- 6. determine the need for additional support teams;
- 7. ensure that evacuation of the area has been accomplished and that a disaster cordon has been established;
- 8. keep the COC informed of the disaster situation and the action being taken;
- 9. ensure that ECP on the cordon is established and is free of unnecessary personnel;
- 10. declare "ALL CLEAR" following withdrawal, as the situation dictates;
- 11. assemble on-scene control group (OSCG), identified in Table 3.3, and determines need for initial reconnaissance of disaster area;
- 12. brief and debrief IRT;
- 13. after area is declared safe, secures accident scene for investigation purposes and implements entry control procedures as required;
- 14. ensure adequate coordination with local civil authorities so that mutual understanding and agreement is reached regarding the appropriate action to be taken at the accident scene;
- 15. coordinate logistical support as necessary;
- 16. report all spills of reportable quantities of oil and hazardous substances in accordance with AR 500-60 through command channels to the appropriate authorities (also see Table 3.5 and Exhibits 3.1, 3.2, and 3.3);
- 17. ensure that the RRT and the appropriate U.S. Department of Defense (DOD) agencies are notified for necessary action if installation personnel cannot respond sufficiently to contain and clean up a spill; and
- 18. In the case of a chemical spill, obtain emergency assistance in the form of information regarding the effects of chemicals on human health or the environment and suggestions for treatment, containment, and control of a spill, leak, fire, or explosion. This emergency assistance is available on a 24-hour basis from the NRC, the Army Operations Center, and the Chemical Transportation Emergency Center. See Table 3.5 for telephone numbers.

The IR-IOSC is the Fort Ritchie Fire Department Chief, Mr. Wolfe. The primary P-IOSC is the Fort Ritchie Environmental Coordinator, Mr. Hofmann. The IR-IOSC will respond to the scene when so requested and assess the seriousness of the situation. If necessary, he will contact the P-IOSC to request additional assistance. Both individuals will serve jointly in this capacity during duty hours and after duty hours. The names and addresses of the IOSCs and other ECs are given in Table 3.3.

3.5 IRT Composition, Training Plans, And The Location Of The Command Operation Center

Members of the IRT must respond to spill emergencies to minimize possible damage to human health or the environment; special training is required for such a response. IRT composition and training plans are discussed in this section. The COC plays a critical role in the spill-response process by coordinating the mobilization of resources and IRT members. The location of the COC, as required per 40 CFR 109.5 and AR 200-1, is provided below.

3.5.1 IRT Composition

The IRT consists of:

- · the IRT leader,
- the IRT organization (which is also the OSCG identified in Table 3.3), and
- · responding forces.

The IRT leader is the Fort Ritchie Fire Chief, or his designee. He commands the IRT responding forces. When necessary, these forces are mobilized and made available to the IOSC.

The IRT organization is a small group consisting of the ECs listed in Table 3.3. Each of the members of the OSCG may be required to participate during emergency response actions. If required, each member will commit the necessary resources (equipment and manpower) to direct the activities within his area of responsibility.

IRT responding forces perform spill-control and cleanup operations. Responding forces are commanded by the IRT Leader. Table 3.6 shows the personnel available for spill response to spills of varying sizes. The IR-IOSC determines the required level of response based on the circumstances of a particular spill event.

3.5.2 IRT Training Program

The EMD is responsible for providing necessary training to all IRT members as necessary and required. IRT training is made up of classroom training and emergency-response training exercises. Classroom instruction is used to instruct IRT members in the hazards of the substances they may be exposed to during spill response. Field training exercises provide training on actual spill-control and cleanup activities. EMD will ensure that all members of the IRT receive proper hazardous substance response training. All IRT members will become intimately familiar with the various facility layouts and the types of oil and hazardous substances used.

IRT members directly involved with spill containment and cleanup are required to receive additional training as described below. This training is not required for groups such as the PAO, MP and

Maintenance Division personnel since they do not handle hazardous substances directly and do not function within the spill exclusion zone.

- All members will be trained in the use of self-contained breathing apparatus (SCBA). Practice for donning, using, and removing the equipment will be done on a quarterly basis. Tanks will be replenished after each of emergency response or training session use.
- Members will be indoctrinated in classification of hazardous substances and their characteristics and in how to clean a spill and decontaminate the area. Incompatibilities between chemicals also will be covered.
- Members will receive Safety and Occupational Health training in accordance with the Occupational Safety and Health Administration (OSHA) and with 29 CFR 1910, 1917, and 1926. A periodic health monitoring program will be established for military and civilian personnel, including project managers who are employed in or responsible for carrying out official duties at oil and hazardous substance spill sites.

In addition, members will receive training in:

- methods of retaining spills,
- methods of recovering spilled substances,
- · the disposition of contaminated soil and absorbent material and recovered pollutant, and
- · restoring contaminated area to its former condition.

One annual training exercise will be held to provide spill-response training to the members of the IRT. The Chief of EMD will conduct the exercises, evaluate the results in conjunction with the EET, and report the results of all training exercises.

Other employees working in areas where oil or hazardous substances are stored, transferred, or used require some level of training to familiarize them with any hazards associated with those materials. The following training procedure is recommended.

- All employees shall be instructed in the safety significance of the chemical spill procedure by their supervisors. It is recommended that all employees who work routinely with hazardous substances receive a one- or two-day industrial hazards course.
- Each new or transferred employee shall be trained to react to hazardous substance spills before being exposed to the hazardous substances.
- Supervisors will orient employees in the specific safety requirements of their work assignments. Supervisors will also provide continuing on-the-job instruction in safety procedures in consultation with EMD.

3.5.3 Command Operations Center Location

The COC (location to be determined by the P-IOSC and IC) is the center of planning and control in the

event of an emergency. The COC will be established as close as possible to the scene of the incident. The location of a COC at Site R will be coordinated with all appropriate authorities (IC, Operations and MP at a minimum) to ensure that security considerations are appropriately addressed. The COC is activated in the event of an emergency requiring implementation of the Fort Ritchie Installation Disaster Plan. A spill of oil or hazardous substance large enough to require mobilization of resources beyond those of the IR-IOSC and the Post Fire Department may require implementation of the Installation Disaster Plan.

3.6 Procedures For IRT Alert And Mobilization, Including Access To Reliable Communication System And PAO Involvement

Immediate alert and mobilization of the IRT is essential to minimize the possible threat to human health and the environment from a hazardous substance spill. A reliable communication system is necessary to convey information between the IOSCs, responding personnel, and COC. This communications system is descibed in Section 3.6.2. IRT mobilization and alert procedures and communication systems available at the Post are discussed below. COC, however, is notified and updated any time the IRT is activated.

3.6.1 IRT Alert And Mobilization

IRT mobilization occurs as a result of a spill discovery and the initiation of the notification process. Upon discovery of an emergency condition requiring immediate response, the emergency notification process shown in Figure 3.1 is initiated. The IR-IOSC will determine whether to mobilize the IRT based on the seriousness of the situation. Once it is determined that emergency response forces are required, COC is notified and the IRT notification process begins. Members are alerted and given instructions to report directly to the disaster site or to a convoy point as conditions dictate.

3.6.2 Reliable Communications System

Communications during a spill emergency are coordinated through the COC, but should be handled directly by the incident commander at the scene as much as possible. Telephone systems are available at most locations where a spill is likely to occur. Should a spill occur in an area where telephones are unavailable or not functioning, intrapost radio systems are available to the IRT for command, control, and coordination of disaster response. Equipment that is available to support communications during installation disaster response is listed in Table 3.7.

3.6.3 PAO Involvement During A Spill Emergency

The PAO is responsible for releasing information to the public news media. Specifically the PAO will perform the following functions. It will:

- act as the point-of-release of all information to the public news media and/or other nongovernmental personnel. PAO will be the Post's releasing authority for information to media, whether such information release is initiated by the Post or is in response to query. This will include requests for interviews with and/or statements from personnel involved in a mishap.
- activate a press center, during emergencies or disasters, at the emergency scene or other location as determined by the Emergency Operations staff in the COC;
- receive initial notification of all accidents, incidents, or emergencies and will dispatch a representative to the scene of the emergency; and
- accompany the P-IOSC to off-site accidents.

3.7 Current List Of Points Of Contact/Alternates On Call To Receive Notice Of A Spill

The names and phone numbers of people to call in the event of a spill are given in Figure 3.1. Table 3.3 gives names and numbers of the IR-IOSC, P-IOSC, and alternates, as well as additional ECs in the event that neither IOSC is available. Table 3.4 gives emergency phone numbers for medical personnel in the event of injuries associated with a spill. Table 3.5 lists key contacts and organizations to be contacted in the event of a spill.

3.8 Surveillance Procedures For Early Detection

Surveillance for the early detection of spills will be accomplished through the following procedures.

- All personnel are charged with the responsibility for periodic inspections of work and storage areas used in their operations.
- The contents of USTs are to be checked periodically to determine if leakage has occurred, in accordance with the management plans for these tanks.
- All oil and hazardous material storage areas shall be kept under security lock when not attended.

3.9 Quantity And Location Of Spill Response Resources And Water Protection Priorities

Fort Ritchie has a wide variety of equipment available for use in the event of a spill. The type and quantity of equipment used for spill containment and cleanup will depend upon the size of the spill and the substance spilled. In the event of a spill, a system of priorities must be used to protect the most critical or most susceptible water resources. The quantity and location of equipment to be used for spill response and the priorities for water resource protection are discussed below.

3.9.1 Quantity And Location Of Spill Response Resources

Each facility where petroleum and/or hazardous materials is handled, loaded, unloaded, etc., should have

spill-containment equipment. The level of equipment should reflect the amount of materials handled in that area and the spill history for the type of operation. Site R run-off and drainage could be significant during a large spill or heavy precipitation, and the site is located directly upgradient from and within one-half mile of a free flowing body of water (Miney Branch). In areas where fuel spills are possible and no existing spill-containment structures are in place, personnel responsible for fuel and hazardous material handling operations should have the necessary materials to contain spills until the necessary forces arrive prepared for spill cleanup.

Limited spill control equipment should be available at a central location, housed in a locker or other suitable enclosure, at each facility where reportable spills are possible.

For spills beyond the capability of the supplies and manpower at the site of the spill, resources are available and can be dispatched to the site of the spill by the IR-IOSC. These resources are maintained at the Post Fire Department.

3.9.2 Priority Of Water Resource Protection

Numerous creeks, streams, and rivers flow from Site R and are tributaries of Miney Branch, the Morocacy River, and ultimately the Potomic River and Chesapeake Bay. In the event of an oil or hazardous substance spill, there is potential for contamination of these surface waters. Efforts must be made to prevent such contamination the quality of all these waters maintained to the standards set for waters used for fish, wildlife and recreation purposes. Also, there is potential for contamination of groundwater, which is used by some local residents as a drinking water source.

Because of above potential, the following priorities are to be maintained in the protection of water resources when planning spill cleanup and containment.

- Contain all spills of fuels, oil, or hazardous substances at their source and prevent escape from the point of the spill.
- Since the criteria for drinking water quality are more stringent than for swimming or fish and wildlife
 water quality, priority must be given to the prevention of large spills which could affect groundwater
 in order to protect sources of local drinking water.

3.10 Other Available Resources For Spill Response On Or Near Site R

For larger spills, additional off-Post assistance may be required. Local, state and federal authorities available to provide assistance in emergency situations are listed in Table 3.5. These organizations provide assistance in accordance with the mutual aid agreements established between Fort Ritchie/Site R and these municipalities and other DOD installations.

It is conceivable that a spill on Post-managed properties could exceed the combined emergency-response capabilities of the Post and surrounding municipalities and installations. A spill exceeding this combined response capability might be quite large or might occur close to running water allowing the spill to evade cleanup attempts. If such an emergency were to occur, it might be necessary to enlist the help of state and Federal agencies such as the Pennsylvania DER - Emergency Notification, U.S. Army Corps of Engineers, NRC, EPA, RRT, or NRT. These agencies usually provide assistance only on an advisory level, but they do have access to trained operations teams that are available for cleanup of large spills.

3.11 Procedures And Techniques To Identify, Contain, Reclaim, And Remove Materials Used In Bulk

Spilled materials will be identified primarily by the history of hazardous substance use and the type of operation being performed in the area of the spill. It is possible, however, that a spill of unknown identity may be discovered that would require identification. In that case, members of the IRT, wearing protective clothing, would attempt to identify the material by available evidence at the scene of the spill. If these attempts fail to determine the identity, the material will be sampled for chemical analysis to determine its identity. Once the material has been identified, cleanup operations will begin.

Spill containment and control operations will be directed as follows by the IR-IOSC.

- If spill material is not contained within bermed areas or grated trenches, then an area of isolation will be established around the spill. The size of this area will generally depend upon the size of the spill and the waste involved.
- If the spill results in the formation of a toxic vapor cloud, evacuation procedures will be enforced. An area at least 500 feet wide and 1000 feet long will be evacuated downwind if quantities of volatile (toxic or combustible) materials are released which result in detectable quantities in the air in this zone. HAZMAT experts will assist the Post Fire Chief and the P-IOSC by providing toxic corridor computations for toxic vapor clouds based on prevailing atmospheric conditions in the spill vicinity. Spill cleanup operations will be directed as follows by the P-IOSC.
- As much of the material as possible will be collected using pumps or tank trucks.
- Hay or other absorbent material will be used to absorb the oil that cannot be collected by pumping.
- Contaminated earth, hay, or other absorbent material will be disposed of in an approved manner as directed by the P-IOSC.
- The P-IOSC will determine when the area has been cleaned up sufficiently to be returned to normal service and will obtain approval from the Maryland Hazardous and Solid Waste Management Administration (HSWMA) to do so.
- Storage of waste materials resulting from clean-up activities will be temporarily stored as described in Section 3.11.1.

- Hazardous or toxic substances will be disposed of in accordance with Federal, state, or local regulations or instructions from EPA.
- In the event that a spill of hazardous substance or waste results in soil or groundwater contamination, a hazardous substance remedial action program will have to be developed to remove the contamination (to levels acceptable to the Pennsylvania DER).

3.11.1 Storage And Treatment Of Released Material

Site R cleanup personnel will temporarily store the hazardous waste resulting from a spill, fire, or explosion in accordance with Pennsylvania hazardous waste regulations to the greatest extent possible until the wastes can be transferred to a permitted HWSF or disposal facility.

3.11.2 Incompatible Wastes

The P-IOSC will ensure that wastes accumulated during a cleanup operation are not stored with incompatible wastes already being stored at the Post.

3.11.3 Post Emergency Equipment Maintenance

Following an emergency event, all emergency equipment listed in Table 3.6 will be cleaned or replaced so that it is fit for its intended use. An inspection of all safety equipment will be conducted before operations are resumed. The regional EPA administrator, state, and local authorities will be notified that Post emergency equipment maintenance has been performed and that operations will resume (see Section 3.12.2).

3.11.4 Documentation And Cost Recovery

Documentation will be collected and maintained to support all spill-response actions taken and to form the basis for cost recovery. Documentation should be sufficient to prove the source and circumstances of the incident, the responsible party or unit and impacts, potential impacts to the public health and welfare and to the environment, and on accurate accounting of costs incurred. Documentation should also be collected for scientific study of the environment and for the research and development of improved response technology, where appropriate. The P-IOSC will ensure the necessary collection and safeguarding of information, samples, and reports. Samples and information must be gathered expeditiously during the response to ensure an accurate record of the impacts incurred. Information and reports will be transmitted to the appropriate agencies in accordance with Section 3.12.2 of this document.

3.12 Reporting Procedures

Immediate and nonimmediate reporting requirements in the event of a spill are discussed in this section.

3.12.1 Immediate Spill Reporting Requirements

According to 40 CFR 110.10, as soon as anyone has knowledge of a reportable oil spill, that person shall immediately notify the NRC of the spill. In the event of a reportable spill, the P-IOSC will notify the NRC and the Pennsylvania DER immediately (see Table 3.5). The DER is to be notified after notification of the NRC. The NRC will notify the USCG and EPA as deemed necessary.

Initial reporting will be made no later than two hours after detection of a spill. The following reporting of oil spills (of any size) will be made to the Pennsylvania DER and will include the items listed below:

- Time of discharge;
- Location of discharge;
- · Mode of transportation or type of facility involved;
- · Type and quantity of oil spilled;
- · Assistance required;
- · Name, address, and telephone number of the person making the report; and
- Any other pertinent information requested by the Pennsylvania DER.

In accordance with regulations developed under CERCLA, spills involving any hazardous substance for which a reportable quantity has been established in 40 CFR 302 and 40 CFR 116, and which is listed under either the Solid Waste Disposal Act, Clean Air Act, CWA, or Toxic Substances Control Act must be reported to the NRC as well as the Pennsylvania DER. The Post EMD also follows the same practice for any substances not listed in the acts noted above but classified as a hazardous waste under RCRA.

If two reportable spills (as defined in the second paragraph of this section above), occur within any 12-month period, the facility must submit a detailed corrective action plan (including a current copy of the ISPC and SPCC) to the regional EPA administrator within 60 days of the occurrence of the second spill.

3.12.2 Required Written Reports

Any reportable spill will be reported in writing within 10 working days by using the Reporting Form for Emergency Events (Exhibit 3.3). It also will be recorded in the operating record, including the time, date, and details.

The regional EPA administrator and state and local authorities shall be notified that post-emergency equipment maintenance has been performed and that operations will resume.

3.13 Resources For RRT For Spill Not Caused By The Army

AR 500-60 directs that resources will be made available to a Regional Response Team when requested for cleanup of a spill not due to Army activities. These resources are listed in Tables 3.6.

3.14 Safety Precautions For Known Hazardous Substances

MSDSs for known hazardous substances handled on the Post-managed properties must be maintained at the Fort Ritchie Safety Office and at each facility where the hazardous substances are used.

3.14.1 Personnel Safety

Safety is of primary concern during response to a spill event. IRT personnel will be properly trained in safety procedures prior to their being allowed to participate in spill-response activities. Proper protective clothing that is consistent with the type of spill and the expected exposure level will be worn. Personnel making initial entry to a site with unknown conditions should be provided with approved pressure-demand, SCBA, appropriate chemical resistant clothing, and two-way radio communications.

A periodic health-monitoring program will be established for all military and civilian personnel, including project managers employed or otherwise responsible for carrying out official duties at oil and hazardous substance spill sites as required by OSHA.

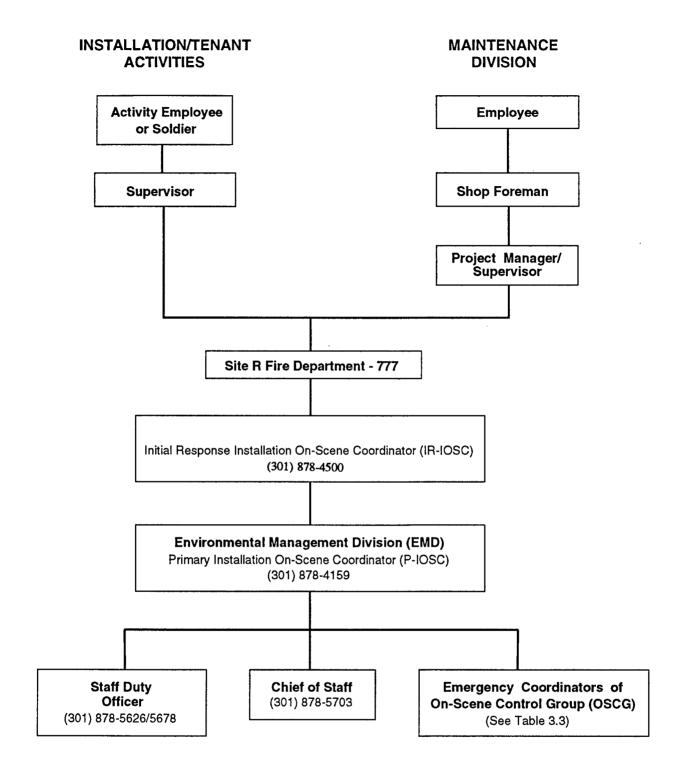
3.14.2 Site Safety

A spill site must be controlled to prevent or reduce the possibility of exposure to contaminants and the transport of hazardous substances from the site. The P-IOSC will ensure that the spill areas are evacuated and that a disaster cordon is established.

3.14.3 Evacuation Plans

An evacuation plan for facility personnel is required in facilities and buildings where there is a possibility of hazardous substance spills. Each building plan must describe signals to be used to begin evacuation, evacuation routes, alternate routes, and assembly points. Each building Fire Marshall will be responsible for posting evacuation routes at strategic locations and ensuring that building personnel are familiar with procedures.

Figures, Table and Exhibits - Alternate Joint Communications Center (Site R), Pennsylvania 64 9959.13 USATHAMA/PT-RITCHIE.RPT/tab.2/11-92



Note:

Each person notifies the next person in the diagram. (employees will contact the Fire Dept. when supervisors are not available)

Figure 3.1. Spill notification sequence - U.S. Army, Site R, Pennsylvania

Table 3.1. Spill response sequence for operations and maintenance personnel - Site R

Step	Responsible Person	Action
1	Maintenance personnel noticing a spill	Report to Maintenance Shop Foreman (or other supervisory personnel) the location, circumstances, quantity, and type of substance spilled.
2	Maintenance Shop Foreman	Assess the situation and notify Project Manager or Supervisor. Call Fire Dept. if conditions obviously require assistance.
3	Maintenance Project Manager /Supervisor	Assess the situation and notify the QA/Safety Manager. Site R policy is that all spills also will be reported to the Fire Department.
3b	QA ¹ /Safety Manager	Notify Site Fire Department Personnel for assistance at 777.
4	Maintenance Shop Foreman	Prepare required after-action reports.

¹Quality Assurance

Table 3.2. Spill response sequence for fuel and hazardous substance spills at post and tenant activities - Site R

Step	Responsibility	Action
1	Personnel noticing a spill	Report to Supervisor the location, circumstances, quantity, and type of substance spilled.
2	Supervisor	Assess the situation and notify Site R emergency personnel for assistance at ext. 777.
3	Supervisor	Prepare required after-action reports.

Table 3.3. Emergency coordinators and members of on-scene control group - Site R

		Duty		
_	Duty Hours	Hours	Off-Duty Hours	Off-Duty Hours
Contact	Phone Number ¹	Address	Phone Number	Address
1111th Signal Battalion Commander	(301)878-3611			
Fire Dept. Chief' (Mr. Wolfe)	(301)878-4536	Bldg. 502	(301)878-3088	
Fire Dept. Assit. Chief (Mr. Carl Grove)	(301)878-5295	Bldg. 502	(717)794-2624	
Environmental Management				
(Mr. Hofmonn) (Mr. Phil Marne)	(301)878-4159 (301)878-4190	Bldg. 603 Bldg. 603	(717) 762-8681 (717)762-1360	
Maintenance Division (Site R)	(301)878-3811	3C25	Duty Officer (301)878-5626/5678	
Directorate of Personnel and Community Affairs	(301)878-5233	Bldg. 346	Duty Officer (301)878- 5626/5678	
Public Affairs Office ²	(301)878-5874	Bldg. 343	Duty Officer (301)878- 5626/5678	
Director of Health Services (Ms. Tomczak)	(301)878-5786		(717)532-9531	
Health Clinic	(301)878-4132 5439	Bldg. 341	(301)878-3500	Bldg 341
Directorate of Logistics	(301)878-5769	Bldg. 837/833	Duty Officer (301)878- 5626/5678	
Staff Judge Advocate	(301)878-5771	Bldg. 330	Duty Officer (301)878-5626/5678	
Provost Marshall's Office ² (PMO)	(301)878-5094	Bldg. 123	Post MP (301)878- 4500/5050	Bldg 123
Chief of Staff	(301)878-5703	Bldg. 304	Duty Officer (301)878-5626/5678	
Safety ² (Mr. Whitney)	(301)878-5833	Bldg. 311	(717)352-8477	

¹When calling from a Fort Ritchie or Site R telephone, only the last four digits need to be dialed.

²Member of Initial Response Term (IRT)/On-Scene Control Group (OSCG)

³Alternate to primary number of IRT/OSCG

Table 3.4. Organizations to be contacted in case of emergency - Site R

Emergency	Organization/Agency	Emergency Phone Number
Injury	Site R Fire Dept.	777
Fire/Explosion	Site R Fire Dept.	777
Hazardous Substance Spill or Release	Site R Fire Dept.	777

Table 3.5. Outside agencies to be notified in the event of an oil or hazardous substance spill' - Site R

Emergency	Organization/Agency	Emergency Phone Number
	Washington Township	(717)791-3152
Oil or Hazardous substance spill	Pennsylvania Department of Environmental Resources, Emergency Response (Southcentral Region) ²	(717)783-4885
or release	Pennsylvania Emergency Management Agency	(717)783-8150
	Pennsylvania Emergency Response	(717)657-4585
	Pennsylvania Statewide Emergency Notification	(800)541-2050 (PA only) or (717)787-7343
	Adams County Emergency Management Agency	(717)334-8603 (Bus) (717)334-7344(24 hr)
	Franklin County Emergency Management Agency	(717)264-4125 (Bus) (717)2694-2813 (24 hr
If spill reaches navigable waters	National Response Center 24-Hour Emergency Number	(800) 424-8802
	Emergency Management Agency (EMA) 24-Hour Emergency Number	(800) 843-0699
Advisory contracts based on extent of emergency	Pennsylvania Dept. of Environmental Resources, Bureru of Water Quality Management, Storage Tank Coordinator	(717) 657-4590
	Pennsylvania Fish Commission	(717) 369-2213
	U.S. Coast Guard Emergency Response Center 24-Hour Emergency Number	(804)398-6638
	Chemical Transportation Emergency Center (CHEMTREC)	(800) 424-9300
	U.S. Environmental Protection (USEPA) Region III 24-Hour Emergency Number	(215) 597-9898
	Hazardous Material Technical Center	(800) 638-8958
	USEPA Hazardous Substance Spill Response Team	584-3554/3816 (DSN)
	U.S. Army Toxic and Hazardous Materials Agency (USATHAMA)	(301) 671-4714/2427
	U.S. Army Corp. of Engineers (Harrisburg)	(765) 717-3750
	U.S. Army Environmental Hygiene Agency	584-3651 (DSN)

¹EMD is authorized to be the point-of-contact for outside agency notification. ²Report required for all spills.

Table 3.6. Resources available for response to spills at Fort Ritchie managed properties and Site R

Quantity	Resource	Controlling Party
	Equipment and Personnel	
1 1 3 1	Front-end loader and operator Bobcat and operator Dumptruck and operator Backhoe and operator	DEH
1 1 2 3 1 1 4	Backhoe and operator Front End Loader and operator Dumptruck and operator Pickup Truck and operator Street Sweeper and operator Road Grader and operator Tractor and operator	ColeJon
4 1 1 1 1	Equipment Fire Engines, 1000gpm, w/in line foam systems Crash Truck, All wheel drive, w/ 200gals of foam Tanker, 1300gal Utility Truck, Used to carry spill supplies Rescue Unit, w/ the following hazmat supplies Plug Kit Non-Spark tool kit Chlorine "A" Kit Brooms Shovels Gas Detector Spill Containment Trailer	Fort Ritchie Fire Dept.
24 10 4 54 100 24 78 30 3 40 6 1 48 2	Other Hazmat Supplies Snakes - General Liquids Snakes - Oil Water Booms Pillows Pads Mini Booms Sorbent C, bag Clay, bag Soda Ash, bag General Sorbent, bag Spill X Acid Neutralizer, pail Containment Boom Tyvek Suits Over Pak Drums	Fort Ritchie Fire Dept.

Table 3.6. Resources available for response to spills at Fort Ritchie managed properties and Site R (cont.)

Quantity	Resource	Controlling Party
	12 Foot Emergency Response Mini Unit Trailer	
1	PIG SKIMMER absorbent sock (3"x46"), 10/box	Fort Ritchie Fire Dept.
1	PIG SKIMMER absorbent boom (3"x10"), 6/box	_
1	PIG SKIMMER absorbent boom (5"x10"), 2/box	
1	PIG SKIMMER absorbent boom (8"x10"), 2/box	
1	PIG SKIMMER absorbent pillow (12"x24"), 10/box	
2	SKIMMING PIG mat sheets (16.5"x20"), 100/box	
1	#BOM202-Spaghetti Boom (8"x10"), 4/bale	
3	#BOM203-Spaghetti Boom (5"x10"), 4/bale	
1	#124CR-HAZ-MAT PIG absorbent sock (3"x46')12/box	
1	#PIG301-HAZ-MAT PIG absorbent sock (3"x10')6/box	
1	#HA1010-HAZ-MAT PIG absorbent dike (5"x10')2/box	
1	#HA2010-HAZ-MAT PIG absorbent dike (5"x10')2/box	
2	#MAT203-PIG mat sheets (16.5"x20"), 100/bale	
1	#HR7015-HAZ-MAT PIG pillow (17"x16"), 10/box	
4	#2048-Blue PIG absorbent socks (3"x46"), 20/box	
1	#PTY201-PIG putty epoxy putty, case	
2	#PAK302-20-Gal. Overpak, 1/box	
1	#GEN305-Non-Sparking shovel (14"Wx41"L), 1/box	
1	#GEN301-Caution Poly bags(18"Wx30"H), 100/bale	
1	#MA3636-SPILSTOPPER (36"x36"), 1/box	

Table 3.7. Communication facilities available during a spill emergency at Fort Ritchie managed properties and Site R

			
1) Equipment: 5 - Base station			
P R A C	Mobiles - 23 Portable - 59 Remote - 3 Antennas - 5 Chargers 34 Command Console - 1		
2) Installa	ation Switchboard Terminated Systems:		
a) b) c)	Defense Switched Network (DSN) 22 circuits, overflow to Site R.		
3) Fort Ri	chie EOC capabilities:		
a)	Military Police	F-1 - (149.865 Mhz) F-2 - (149.600 Mhz) F-3 - (149.725 Mhz) F-4 - (30.18 Mhz) F-5 - (150.750 Mhz)	
b)	Fire Department	F-1 - (150.750 Mhz) F-2 - (46.16 Mhz) F-3 - (46.10 Mhz) F-4 - (46.36 Mhz) F-5 - (149.865 Mhz) F-6 - (148.900 Mhz)	
(c)	DEH	(148.900 Mhz)	
d)	Washington County	(39.18 Mhz)	
e)	Franklin County Fire	(46.16, 46.10, 46.36 Mhz)	
f)	State Police	(on request)	
4) M	MARS Systems (Located in Bldg 141).		
Н	F SSB Communications		

Exhibit 3.1. Site R Spill Report¹

Item	Information
1.	Name, location, and type of function of installation.
2.	Commander of installation and phone number.
3.	Name and phone number of person making report.
4.	Type and estimated amount of material. Severity of incident.
5.	Location of spill. Specify areas effected by spill.
6.	Local discovery time and date of incident.
7.	Receiving stream or waters.
8.	Cause of incident and equipment/facility involved.
9.	Injuries and/or property damage.
10.	Duration of discharge.
11.	Remedial actions taken and estimated completion date.
12.	Agencies notified.
13.	Samples taken (yes or no).
14.	Potential dangers (fire, explosion, toxic vapor, etc.).
15.	Assistance required.
14. 15. 16. 17.	Anticipated or actual reaction by news media and public to the incident.
17.	Other items required in the regional contingency plan and a general discussion of the incident. See Chapter 9 of AR 200-1 for further discussion.

¹Based on AR 200-1 requirements for telephone reports on spill emergency (to next higher HQ, AOC, USATHAMA, LEPC and NRC)

Exhibit 3.2. Oil and Hazardous Substances Spill Notification Information - Site R

The following information will be provided by memorandum to EMD following the discovery and initial telephonic reporting of the spill:		
1.	Time spill occurred or was first observed:	
2.	Name of person first observing spill:	
3.	Location of initial spill and present location if moving:	
4.	Type of spilled material:	
5.	Estimate of amount spilled or rate of release if continuing:	
6.	Environmental conditions - (e.g., wind direction and speed, wave action, and currents):	
7.	If from mobile container (e.g., pod, tanker, railway tanker), identity of vehicle, unit, owner (if other than the U.S. Army), and capacity:	
8.	Description of area likely to be affected by spill (e.g., river banks, lakes, land areas, or wildlife areas):	
9.	Cause of spill, if determined:	
10.	Action taken to combat spill, if any:	
11.	Activities or authorities notified:	

Exhibit 3.3. Reporting Form for Emergency Events - Site R, Pennsylvania.

Note: This form is to be prepared and submitted by Environmental Management Division.

Name, address, and phone number of owner or operator:
Name, address, and phone number of facility where spill occurred:
Date, time, and type of incident (e.g., fire, explosion):
Name and quantity of material(s) involved:
A complete description of circumstances contributing to the spill:
Assessment of actual or potential hazards to human health or the environment (if applicable):
Contaminant removal and clean-up operations. Estimated quantity and disposition of material recovered from the incident:
Procedures, methods, and precautions instituted to prevent recurrence:
Certification that the information provided is true and correct:

Send to: Pennsylvania Department of Environmental Resources U.S. EPA, Region III Regional Administrator (EPA)

3.0 REFERENCES

- Maryland Hazardous and Solid Waste Management Administration, Department of the Environment, "Oil Pollution and Tank Management", Code of Maryland Regulations (COMAR) 26.10.01, July 1, 1991.
- Office of the Federal Register, National Archives and Records Administration, 1971, "Criteria for State, Local and Regional Oil Removal Contingency Plans," 40 CFR Part 109.
- Office of the Federal Register, National Archives and Records Administration, 1987, "Discharge of Oil", 40 CFR 110.
- Office of the Federal Register, National Archives and Records Administration, "Oil Pollution Prevention" 40 CFR 112.
- Pennsylvania Department of Environment Resources, Bureau of Water Quality Management, "Pennsylvania Clean Streams Law and Regulations (25 Pa Code, Chapter 101), 1992.
- Pennsylvania Department of Environment Resources, Bureau of Water Quality Management, "Pennsylvania Storage Tank and Spill Prevention Act and Regulations (25 Pa Code, Chapter 245, subchapter L), 1992.
- U.S. Army Regulation 200-1. Environmental quality, environmental protection and enhancement. 23 April 1990. Washington D.C.

APPENDIX A



LOCAL EMERGENCY PLANNING COMMITTEE

Room 6, Adams County Courthouse 111-117 Baltimore Street Gettysburg, PA 17325-2313

Phone (717) 334-8603 FAX (717) 334-1822 Jonathan C. Hansen SARA Planner



Downstream Notification List

Richard L. Ketterman

EMA Director

September 1, 1992

Mr. Phil Marne
DEH-EM
Building 603
Fort Ritchie, Maryland

21719-5010

Dear Mr. Marne:

Enclosed are two lists of the fresh water intake users in Adams County. The first list is from the Pennsylvania Department of Environmental Resources, the second list is from Adams County's records. I hope these lists will be sufficient.

If you have any more questions, please feel free to contact me.

Sincerly,

Jonathan C. Hansen

SARA Planner/9-1-1 Coordinator

rathan P. Hansen

Enclosures JCH/jch cc: file

WATER INTAKES AND ADDRESSES

CONCITUDE	00000000000000000000000000000000000000
LATITUDE	0
RIVER	
STREAM NAME	Quaker Run - Trib # 09089 Mussaburg Run - Trib # 09089 Mussaburg Run Mussaburg Run Mussaburg Run Little Margh Creek-Trib # 63639 Little Margh Creek-Trib # 63639 Little Margh Creek-Trib # 63639 Conceaso Creek-Trib # 63639 Conceaso Creek-Trib # 63639 Conceaso Creek-Trib # 63639 Margh Branch Creek-Trib # 63639 Miney Branch Run Margh Creek-Trib # 58176 Miney Branch Trib # 58176 Miney Branch Trib # 608132 Muskrat Run M
FACILITY TYPE	90000000000000000000000000000000000000
ION PACILITY NAME	Bear Mt Orchards Surface Withdrawal Bear Mt Orchards Pond Withdrawal Boyer Mursery & Orchards Inc. Bream Orchard Inc. Cadbury Schweppes Inc. Surface Withdrawal Bream Orchard Inc. Buffy Mott Co Inc. Bufface Withdrawal Buffy Mott Co Inc. Bufface Withdrawal Gaffysburg Municipal Authority Gaffysburg Municipal Authority Gaffysburg Municipal Authority Getysburg Municipal Authority Group Orchards Inc. Hay Robert L. Hay Robert L. Hay Robert L. Hay Robert L. Bay Robert L
IDENTIFICATION NUMBER	4.000000000000000000000000000000000000

WATER INTAKES AND ADDRESSES

IDENTIFICATION NUMBER	DN PACILITY NAME	PACILITY	STEBAN NAKE	21VE2	LATITUDE	LONGITUDE	
220	Mason Dixon Parm Inc. Mason Dixon Parms Inc Surface Withd Mason Dixon Parms Inc Fond Withd Colorate Inc Instram Diversion Mountain View Fruit Parms Inc Ponds Mountain View Pruit Parms Inc Ponds Mountain Peters John Finc Pond Withdrawal Peters John Finc Pond Withdrawal Rice Ance North Concards - Pond Withdrawal Rice Ance Mice Inc Pond Withdrawal Sandoe Raiph S Pond Withdrawal Valley Quarries Rock Greek Withdrawal Abbottstown Municipal Authority Abbottstown Municipal Authority Adams County Mursery Fond Withdrawal Adams County Mursery Pond Withdrawal Adams County Mur	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	$\begin{array}{c} \alpha_{1}\alpha_{2}\alpha_{3}\alpha_{4}\alpha_{5}\alpha_{5}\alpha_{5}\alpha_{5}\alpha_{5}\alpha_{5}\alpha_{5}\alpha_{5$	CEPEPEPEPEPEPEPEPEPEPEPEPEPEPEPEPEPEPEP	
0011-001	Bear Mt Orchards	=	Correct Men - Trib server	2.5	60 10 67	**	

ANNEX

WATER INTAKES AND ADDRESSES

İ	
LONGITUDE	
LATITUDE	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
05 00 00 00 01 00 00 00 00 00 00 00 00 00 00 00 00 00	######################################
PACILITY STREAM NAME	Conewago Creek - Trib #09122 Conewago Creek - Trib #09122 Conewago Creek - Trib #09126 Conewago Creek - Trib #09126 Conewago Creek - Trib #09126 Copplar Spring Creek - Trib #09101 Little Marsh Creek - Trib #0910 Bermudian Creek - Trib #08130 Bermudian Creek - Trib #08135 Bermudian Creek - Trib #08135
TION PACILITY NAME	Hollabaugh Bros Bollabugh Bros Bollabugh Bros Pond Inland Container Corp Inland Container Corp Inland Container Corp Inland Container Corp IncousePoods Little Marsh Div 0619 IncousePoods CoOp Gardests Inho Orchards-Pond Withdrawal 0146 Kuntz Presont S. Kuntz Presont Pond Withdrawal 0146 Maclott Maclott
IDENTIFICATION NUMBER	10000100000000000000000000000000000000